

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

COMMISSIONERS: Deborah Platt Majoras, Chairman  
Pamela Jones Harbour  
Jon Leibowitz  
William E. Kovacic  
J. Thomas Rosch

**In the Matter of**

**RAMBUS INC.,**

**a corporation.**

**Docket No. 9302**

**MOTION OF RESPONDENT RAMBUS INC.  
FOR LEAVE TO FILE REPLY IN SUPPORT OF ITS PETITION FOR  
RECONSIDERATION OF THE COMMISSION'S FINAL ORDER**

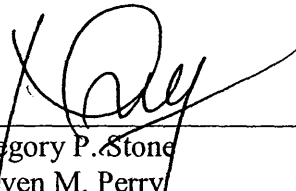
Respondent Rambus Inc. ("Rambus") hereby moves for leave to file the attached Reply in Support of its Petition for Reconsideration of the Commission's Final Order. Rule 3.55 of the Commission's Rules of Practice for Adjudicative Proceedings, 16 C.F.R. § 3.55, is silent as to the filing of a reply brief in support of a petition for reconsideration, so Rambus files this motion in case leave is required.

Rambus's Petition for Reconsideration seeks to clarify various aspects of the Commission's Final Order, and asks the Commission to revise certain portions of that Order to harmonize it with the Commission's expressed remedial goals and to minimize irretrievable losses pending appeal. In their Response, filed on February 26, 2007, Complaint Counsel agree that the Order should be clarified, but misunderstand Rambus's position in some respects and raise new but flawed arguments in others. Rambus believes that the attached reply brief will

materially aid the Commission in understanding the issues before it. In addition, because the Commission has before it Respondent's Motion for Stay of Order Pending Appeal and a subsequently-filed alternative stay proposal from Complaint Counsel, the Commission would also benefit from an explanation of the possible interaction of these stay proposals with the Petition for Reconsideration.

Accordingly, Respondent moves for leave to file the attached reply brief in support of its Petition for Reconsideration of the Commission's Final Order.

Respectfully submitted,



---

Gregory P. Stone  
Steven M. Perry  
MUNGER, TOLLES & OLSON LLP  
355 South Grand Avenue, 35th Floor  
Los Angeles, California 90071-1560  
(213) 683-9100

A. Douglas Melamed  
Paul R.Q. Wolfson  
WILMER CUTLER PICKERING  
HALE AND DORR LLP  
1875 Pennsylvania Avenue, N.W.  
Washington, D.C. 20006  
(202) 663-6000

Attorneys for Respondent Rambus Inc.

March 7, 2007

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

COMMISSIONERS: Deborah Platt Majoras, Chairman  
Pamela Jones Harbour  
Jon Leibowitz  
William E. Kovacic  
J. Thomas Rosch

**In the Matter of**

**RAMBUS INC.,**

**a corporation.**

**Docket No. 9302**

**[PROPOSED] ORDER GRANTING LEAVE TO RESPONDENT RAMBUS INC. TO  
FILE REPLY IN SUPPORT OF ITS PETITION FOR RECONSIDERATION OF THE  
COMMISSION'S FINAL ORDER**

Upon consideration of Respondent Rambus Inc.'s motion for leave to file a Reply in Support of its Petition for Reconsideration of the Commission's Final Order,

**IT IS ORDERED** that Respondent's motion is **GRANTED**. The Reply attached to Respondent's motion shall be deemed timely filed as of the date of this Order.

By the Commission.

Donald S. Clark  
Secretary

SEAL