

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

**In the Matter of**

**RAMBUS INC.,**

**a corporation.**

**Docket No. 9302**

**RAMBUS' PRELIMINARY WITNESS LIST**

Respondent Rambus Inc. ("Rambus") hereby designates those persons currently contemplated to be called to testify as witnesses, in person or by deposition, at the hearing in this matter. Rambus reserves the right: (1) not to call any of the persons listed herein to testify at the hearing, as circumstances may warrant; (2) to call as a witness any person identified as a witness by Complaint Counsel, all of whom are hereby cross-designated for that purpose; (3) to designate additional witnesses as rebuttal witnesses, as needed depending upon issues raised by or witnesses listed by Complaint Counsel in accordance with the terms of the Scheduling Order dated August 6, 2002; (4) to supplement or amend this preliminary witness list and any future rebuttal witness list to add any individual who is designated by a corporation or other organization to testify on its behalf in a deposition pursuant to Commission Rule of Practice 3.33(c); (5) to supplement or amend this preliminary witness list and any future rebuttal witness list to add any individual for the purpose of establishing the authenticity or admissibility of documents; and (6) to

supplement or amend this preliminary witness list and any future rebuttal witness list as permitted by the Commission's Rules of Practice and by the terms of the Scheduling Order dated August 6, 2002.

Subject to these reservations of rights, Rambus' preliminary list of witnesses is as follows:

1. Abid Ahmad  
Intel Corporation
2. Tony Balistreri  
TI
3. Sam Calvin  
Intel Corporation
4. Julie Cates  
Rambus
5. David Chapman  
GSI Technology (formerly Motorola)
6. Paul Chiang  
Silicon Magic
7. Gene Cloud  
Micron Technology
8. Bill Davidow  
Rambus
9. Jan DuPreez  
Micron Technology (formerly Infineon)
10. Clement Fang  
Sun Microsystems
11. Michael Farmwald  
Rambus

12. Dick Foss  
Mosaid
13. Charles Furnweger (formerly NEC)
14. Billy Garrett  
(formerly Rambus)
15. Jim Gasbarro  
(formerly Rambus)
16. Ramesh Gidwani  
TI
17. David Gray  
AMD (formerly Intel)
18. Ken Grillo  
IBM
19. Alan Grossmeir  
Silicon Graphics
20. Craig Hampel  
Rambus
21. Jong-Hee Han  
Hynix
22. Ejaz Haq  
JAZiO (formerly Samsung)
23. Gary Harmon  
Rambus
24. Joe Hartigan  
TI
25. Mark Horowitz  
Rambus
26. Dan Johnson  
Intel Corporation

27. Larry Jordan  
IDT/Toshiba
28. Howard Kalter  
IBM
29. Avo Kanadjian  
Rambus
30. Joel Karp  
Rambus (formerly Samsung)
31. Kevin Kilbuck  
Toshiba
32. Harry Kuhn  
Intel
33. Konrad Lai  
Intel Corporation
34. Jeffrey Lee  
NEC/Elpida
35. Terry Ludlow  
Chipworks
36. Jeff Mailloux  
Micron
37. Amy Marasco  
ANSI
38. Nick Mati  
Intel Corporation
39. Ken McGhee  
JEDEC
40. Jim McGrath  
Molex
41. David Mooring  
Rambus

42. Roger Norwood  
Micron
43. Larry Palley  
Intel Corporation
44. Sang Park  
Hynix
45. Earnest Powell  
TI
46. Steve Pawlowski  
Intel Corporation
47. Betty Prince  
Memory Strategies Int'l (formerly TI)
48. Allen Roberts  
(formerly Rambus)
49. Richard Rogers  
IBM (retired)
50. Cheryl Rowden  
IEEE
51. Kevin Ryan  
Micron
52. Dr. Frank Stein  
JEDEC consultant
53. Neal Steinberg  
(formerly Rambus)
54. Geoff Tate  
Rambus
55. Edwin Taylor  
Blakeley, Sokoloff, Taylor & Zafman

56. Bill Vogley  
TI
57. David Vornholt  
Xilinx (formerly Rambus)
58. Terry Walther  
Micron
59. Fred Ware  
Rambus
60. Yohji Watanabe  
Toshiba
61. Keith Weinstock  
Micron
62. Hans Wiggers  
Hewlett-Packard (retired)
63. Albert Yu  
Intel
64. Anthony Zilka  
Intel Corporation

DATED: October \_\_, 2002

Respectfully submitted,

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Gregory P. Stone  
Steven M. Perry  
Sean P. Gates  
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**PROOF OF SERVICE BY FACSIMILE/FEDERAL EXPRESS**

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 355 South Grand Avenue, 35th Floor, Los Angeles, California 90071.

On October 16, 2002, I served the foregoing document described as: **RAMBUS' PRELIMINARY WITNESS LIST** on the designated parties in this action by having a true copy thereof transmitted by facsimile machine to the number listed below. I caused the facsimile machine to print a record of the transmission, a copy of which is attached to this declaration.

On October 16, 2002, I also served a copy of the aforementioned document on the designated parties in this action by Federal Express overnight courier service. I am "readily familiar" with the firm's practice of collection and processing correspondence for delivery to an employee of Federal Express. Under that practice it would be delivered to an employee of Federal Express on that same day at Los Angeles, California with charges to be billed to Munger, Tolles & Olson's account for delivery to the office of the addressee on October 17, 2002 in the ordinary course of business.

**By Facsimile and FedEx**

M. Sean Royall, Esq.  
Federal Trade Commission  
600 Pennsylvania Avenue, N.W.  
Room H-372  
Washington, D.C. 20580  
**Facsimile: 202-326-2884**

**By Facsimile and FedEx**

Geoffrey Oliver, Esq.  
Malcolm L. Catt, Esq.  
Federal Trade Commission  
601 New Jersey Avenue  
Washington, D.C. 20001  
**Facsimile: 202-326-3496**

**By FedEx**

Hon. James P. Timony  
Administrative Law Judge  
Federal Trade Commission  
Room H-112  
600 Pennsylvania Avenue, N.W.  
Washington, D.C. 20580

Executed on October 16, 2002, at Los Angeles, California.

I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

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Eunice Ikemoto



UNITED STATES OF AMERICA  
BEFORE THE FEDERAL TRADE COMMISSION

_____	)	
In the Matter of	)	
	)	Docket No. 9302
RAMBUS INC.,	)	
a corporation,	)	
_____	)	

**CERTIFICATION**

I, Steven M. Perry, hereby certify that the electronic copy of Rambus' Preliminary Witness List accompanying this certification is a true and correct copy of the paper original and that a paper copy with an original signature is being filed with the Secretary of the Commission on October 17, 2002 by other means.

Dated: October 17, 2002

/s/ \_\_\_\_\_  
Steven M. Perry