

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

In the Matter of

RAMBUS INC.,

a corporation.

Docket No. 9302

**RESPONDENT'S APPLICATION FOR THE
ISSUANCE OF A SUBPOENA *AD TESTIFICANDUM***

Pursuant to Rule 3.34(a)(2) of the Federal Trade Commission's Rules of Practice, Respondent Rambus, Inc. ("Rambus") makes this application for the issuance of a subpoena *ad testificandum* to be issued to Dr. K.H. Oh, who was until recently in charge of the semiconductor group at Hynix, a major DRAM manufacturer.

In addition to his knowledge of the worldwide memory market in the relevant time period, Dr. Oh was also involved in negotiations with Rambus in 1995 and/or 1996 regarding the licensing by Hynix of Rambus technology, and he signed such a license on behalf of Hynix. Rambus is also informed and believes that Dr. Oh received reports from Hynix's JEDEC representatives about issues raised at JEDEC meetings.

Given his position at Hynix, Dr. Oh's testimony is reasonably relevant to the issues raised in this matter. Dr. Oh was named in Complaint Counsel's Preliminary

Witness List, and was subsequently “cross-designated” by Rambus in its own Preliminary Witness List.

Although Dr. Oh lives in South Korea, he is apparently traveling to the United States in the next ten days to give a deposition in this matter and in the private lawsuit between Hynix and Rambus. Given the importance of his testimony, and the strong preference for live testimony wherever possible, Rambus requests that a subpoena *ad testificandum* be issued so that it may be served upon Dr. Oh in connection with his deposition.

For the foregoing reasons, Rambus respectfully requests that Your Honor grant its application for a subpoena *ad testificandum* to be served on Dr. Oh.

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Respectfully submitted,

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