UNITED STATES OF AMERICA BEFORE FEDERAL TRADE COMMISSION



Before The Honorable James P. Timony Administrative Law Judge

In the Matter of

RAMBUS INCORPORATED,

a corporation.

Docket No. 9302

UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO RAMBUS INC.'S MOTION TO COMPEL

Samsung Semiconductor Inc. ("Samsung"), a non-party to the above-captioned case, through undersigned counsel, file this motion for a brief extension of time for Samsung to file its response to Rambus Incorporated's ("Rambus") motion to compel Samsung to produce certain documents withheld on privilege grounds. Specifically, Rambus seeks to compel production of confidential and privileged documents relevant to the Advanced DRAM Technology ("ADT"), a multi-party group.

Rambus served Samsung with the motion on December 9, 2002. Pursuant to Federal Trade Commission Rules of Practice § 3.22(c), Samsung's response to the motion would be due on or before December 19, 2002.

Samsung is presently conferring with counsel for other ADT members concerning Rambus' motion and the treatment of various privileged documents. Due to the number of ADT members, the number of documents, and the complexity of the issues, Samsung has not completed its discussions with other ADT members at this time.

Rambus has agreed to extend the time for Samsung and others to respond to the motion to December 23, 2002. The parties have also agreed that Samsung will produce certain documents from its privilege log that Samsung and others will not litigate the privilege issues over by December 24, 2002. The extension is not sought for delay, but only to allow for the resolution of this discovery issue.

Counsel for the Federal Trade Commission do not oppose this extension.

Accordingly, Samsung requests that this motion be granted and that it and any other interested parties be given until December 23, 2002 to respond to Rambus' motion, without prejudice to seek a further extension of time.

Dated: December 18, 2002

Respectfully submitted,

Christine P. Hsu

WEIL, GOTSHAL & MANGES LLP

1501 K Street NW, Suite 100 Washington, D.C. 20005 Telephone: (202) 682-7000

Fax: (202) 857-0940

and

David J. Healey
Anita E. Kadala

WEIL GOTSHAL & MANGES LLP

700 Louisiana, Suite 1600 Houston, TX 77002

Telephone: (713) 546-5000

Fax: (713) 224-9511

CERTIFICATE OF SERVICE

It is hereby certified that copies of the foregoing were served this 18th day of December, 2002, on the following:

Donald S. Clarke

(By Hand)

Secretary

Office of the Secretary

Federal Trade Commission 600 Pennsylvania Ave., N.W.

Washington, D.C. 20580

The Honorable James P. Timony

(By Hand)

Administrative Law Judge

Federal Trade Commission

600 Pennsylvania Ave., N.W.

Washington, D.C. 20580

Richard B. Dagen

(By Hand)

Assistant Director

Bureau of Competition

Federal Trade Commission

601 New Jersey, NW, Room 6223

Washington, D.C. 20850

Malcolm L. Catt

(By Hand)

Robert P. Davis

Federal Trade Commission

600 Pennsylvania Ave., N.W.

Washington, D.C. 20580

Counsel for Rambus Incorporated

Truc-Linh N. Nguyen

Munger, Tolles & Olson LLP

355 South Grand Avenue

Los Angeles, CA 90071-1560

(By Facsimile)

Counsel for the Advanced DRAM Technology Consortium

Robert M. Masters, Esq. Sughrue Mion, PLLC 2100 Pennslyvania Avenue, N.W. Suite 800 Washington, DC 20037-3213 (By Facsimile)

Counsel for Infineon Technologies AG

Clifford E. Wilkins, Jr., Esq. Kirkland and Ellis 153 East 53rd Street New York, NY 10022-4675 (By Facsimile)

Counsel for Hynix Semiconductor Inc.

Theodore G. Brown, III., Esq. Townsend and Townsend and Crew LLP 379 Lytton Avenue Palo Alton, CA 94301-1431 (By Facsimile)

Counsel for Intel Corporation

Darren B. Bernhard, Esq. Howrey Simon Arnold & White, LLP 1299 Pennsylvania Avenue, N.W. Washington, DC 20004 (By Facsimile)

Counsel for Micron Technology, Inc.

Jared B. Bobrow, Esq. Weil, Gotshal & Manges LLP 201 Redwood Shores Parkway Redwood Shores, CA 94065 (By Facsimile)

Christine P. Hen

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ORDER

Upon consideration of the Unopposed Motion for Extension of Time to Respond to Rambus Inc.'s Motion to Compel, filed in the above-captioned matter on December 18, 2002 by Samsung Semiconductor, Inc. ("Samsung"), it is hereby ordered that Samsung and other interested parties shall be given until December 23, 2002 to file responses to Rambus' Motion to Compel (which was filed by Rambus on December 9, 2002), without prejudice to seek a further extension of this deadline.

The Honorable James P. Timony Administrative Law Judge