# UNITED STATES OF AMERICA BEFORE THE FEDERAL TRADE COMMISSION

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

#### **CERTIFICATION**

I, Gregory P. Stone, hereby certify that the electronic copy of UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT COUNSEL'S MOTION FOR DEFAULT JUDGMENT and ORDER GRANTING RESPONDENT'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT COUNSEL'S MOTION FOR DEFAULT JUDGMENT 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 December 24, 2002, by other means.

Dated: December 24, 2002

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E. LEROY TOLLES

December 23, 2002

A PROFESSIONAL CORPORATION

VIA FEDERAL EXPRESS

Donald S. Clark, Secretary Federal Trade Commission 600 Pennsylvania Avenue, N.W. Room H-159 Washington, D.C. 20580

Re: In the Matter of Rambus Incorporated, FTC Docket No. 9302

Dear Mr. Clark:

Enclosed please find the original and two copies of Respondent Rambus Inc.'s Unopposed Motion for Extension of Time to Respond to Complaint Counsel's Motion for Default Judgment and Order Granting Respondent's Unopposed Motion for Extension of Time to Respond to Complaint Counsel's Motion for Default Judgment, which we request you file with the Federal Trade Commission. Please conform one of the copies and return it to us in the enclosed self-addressed envelope.

If you have any questions regarding these papers, please do not hesitate to call me at (213) 683-9255. Thank you for your assistance in this matter.

Very truly yours.

Gregory P. Stone

GPS:cbp Enclosures

cc: Honorable James P. Timony M. Sean Royall, Esq. Geoffrey Oliver, Esq. Malcolm L. Catt, Esq. Richard B. Dagen, Esq.

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# UNITED STATES OF AMERICA BEFORE THE FEDERAL TRADE COMMISSION

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RAMBUS INC.,

Docket No. 9302

a corporation.

# UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT COUNSEL'S MOTION FOR DEFAULT JUDGMENT

Respondent Rambus Inc. ("Rambus") respectfully submits this unopposed motion for a brief extension of time to respond to Complaint Counsel's motion for default judgment. Specifically, Rambus requests that it be granted an extension of time to and including January 13, 2003, within which to file its response, and that Complaint Counsel be granted an extension of time to and including January 23, 2003, within which to file their reply papers, should Your Honor permit a reply.

Complaint Counsel served their motion for default judgment and most of their supporting papers on counsel for Rambus on Friday, December 20, 2002. The remainder of Complaint Counsel's supporting papers are expected to be served on Rambus's counsel by Federal Express on Monday, December 23, 2002. The Revised Scheduling Order allows for three weeks within which to file responses to motions for summary decision, and given the similarity of the relief sought by Complaint Counsel's motion for default judgment to the relief that would be sought in a motion for summary decision, in

light of the volume of supporting materials submitted by Complaint Counsel, and in recognition of the holiday season and its impact on work schedules, counsel for Rambus requested that Complaint Counsel agree to extend to three weeks (as is provided for motions for summary decision) the time for Rambus's counsel to respond to the motion for default judgment. Complaint Counsel agreed, and also asked for ten days thereafter within which to file a reply in support of their motion in the event Your Honor would allow a reply to be filed. In this same regard, Complaint Counsel and counsel for Rambus also agreed that if Your Honor will allow reply briefs to be filed in support of motions for summary decision, that such replies shall be filed within ten days after the response is filed.

Thus, Rambus requests that it be granted an extension to and including January 13, 2003, within which to file its response to Complaint Counsel's motion for default judgment, and that Complaint Counsel be allowed to file a reply, if Your Honor permits a reply, on or before January 23, 2003.

Complaint Counsel does not oppose this motion.

# Accordingly, Rambus requests that this motion be granted.

DATED: December 23, 2002 Respectfully submitted,

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

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RAMBUS INC.,

Docket No. 9302

a corporation.

# ORDER GRANTING RESPONDENT'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT COUNSEL'S MOTION FOR DEFAULT JUDGMENT

Upon consideration of Respondent's Unopposed Motion for Extension of Time to Respond to Complaint Counsel's Motion for Default Judgment, IT IS HEREBY ORDERED that Respondent's Unopposed Motion is GRANTED, and that Respondent may file its response to Complaint Counsel's motion for default judgment on or before January 13, 2003, and that, if it later should be determined that a reply may be filed by Complaint Counsel in support of their motion for default judgment, such reply shall be filed no later than January 23, 2003.

James P. Timony Administrative Law Judge

# 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 December 23, 2002, I served the foregoing document described as: UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT COUNSEL'S MOTION FOR DEFAULT JUDGMENT; ORDER GRANTING RESPONDENT'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT COUNSEL'S MOTION FOR DEFAULT

JUDGMENT 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 December 23, 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 December 24, 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 FedEx [2copies]

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

#### 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 Facsimile and Fed Ex

Richard B. Dagen, Esq. Federal Trade Commission 601 Pennsylvania Avenue, N.W. Room 6223 Washington, D.C. 20580 Facsimile: 202-326-3496

[continued on next page]

By Fed Ex: [Original + 2] Donald S. Clark, Secretary Federal Trade Commission Room H-159 600 Pennsylvania Avenue, N.W. Washington, D.C. 20580

Executed on December 23, 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.

Carole B. Phillip

\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\* MULTI TX/RX REPORT \*\*\* \*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\* 2403 TX/RX NO 7 PGS. TX/RX INCOMPLETE \*##8307012023263496# 72025-6120 TRANSACTION OK (1) (2) ##8307012023263496# ##8307012023262884# (3) ERROR INFORMATION

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DATE:

December 23, 2002

FROM:

Gregory P. Stone [Direct Dial: 213.683.9255]

RE:

REF NO.:

22076-00006

PAGES: / / (including cover page)

**MESSAGE:**