

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

In the matter of)

RAMBUS INCORPORATED,)

a corporation.)

Docket No. 9302

**DECLARATION OF SUSAN VAN KEULEN IN SUPPORT OF
HYNIX'S MOTION FOR *IN CAMERA* TREATMENT OF PROPOSED EVIDENCE**

I, Susan van Keulen, declare as follows:

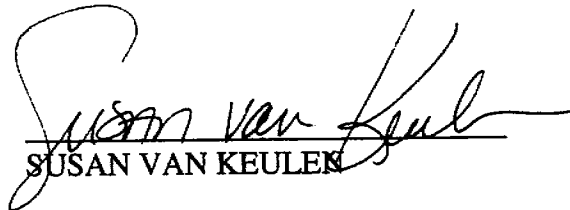
1. I am a partner at Thelen Reid & Priest LLP, which is (a) counsel of record for Hynix Semiconductor, Inc., Hynix Semiconductor America Inc., and Hynix Semiconductor Deutschland GmbH (collectively, "Hynix") in the action before the United States District Court for the Northern District of California entitled *Hynix Semiconductor, Inc., et al. v. Rambus Inc.*, case no. CV 00-20905 RMW ("*Hynix v. Rambus*") and (b) coordinating counsel for Hynix's litigation with Rambus worldwide. I make this declaration in support of Hynix's motion pursuant to Federal Trade Commission Rule of Practice 16 C.F.R. section 3.45(b) ("Section 3.45(b)") for an order directing *in camera* treatment of certain highly confidential excerpts from Hynix documents that Complaint Counsel herein propose to enter into evidence at the hearing of this matter.

2. On April 1, 2003 Hynix received written notice from Complaint Counsel that they intended to introduce into evidence some 450 documents Hynix produced to them. A true and correct copy of that notice is attached hereto as Exhibit A. On April 1, 2003 our firm received

written notice from Rambus that it intended to submit into evidence four documents Hynix produced to it in litigation. A true and correct copy of that notice is attached hereto as Exhibit B. I personally reviewed each of the documents listed by Complaint Counsel and Rambus and determined that only portions of six of those documents require the protection of *in camera* treatment in this matter.

3. The documents at issue in this motion were produced in this action pursuant to subpoena and under the "confidential discovery material" protection provided by the Protective Order Governing Discovery Material here. Attached hereto as Exhibit C is a true and correct copy of my letter to Complaint Counsel of August 23, 2002 confirming this protection. The documents were also produced to Rambus in the *Hynix v. Rambus* litigation under the protection of the Protective Order in that case, a copy of which is attached hereto as Exhibit D. Moreover, our firm is under strict instructions from Hynix to keep these documents confidential, and we ensure that other attorneys and/or experts working for Hynix in its various adversarial proceedings against Rambus treat these documents the same way.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 10th day of April, 2003, at San Jose, California.


SUSAN VAN KEULEN