

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION

In the Matter of
RAMBUS INC.,
a corporation.

Docket No. 9302

**RESPONDENT RAMBUS INC.'S MOTION FOR LEAVE TO FILE A CORRECTED
MOTION FOR *IN CAMERA* TREATMENT OF DOCUMENTS THAT
COMPLAINT COUNSEL IDENTIFY AS POTENTIAL TRIAL EXHIBITS**

On April 14, 2003, Respondent Rambus Inc. (“Rambus”) filed its Motion For *In Camera* Treatment Of Documents That Complaint Counsel Identify As Potential Trial Exhibits (“Motion”), together with a Proposed Order Granting Respondent Rambus Inc.’s Motion For *In Camera* Treatment Of Documents That Complaint Counsel Identify As Potential Trial Exhibits, supporting Declarations of Robert Eulau, Robert G. Kramer, and Laura Stark, and the documents requiring *in camera* treatment.

Upon reviewing these filings, Rambus discovered that the Declaration of Robert G. Kramer at ¶¶ 4 and 29 (“Kramer Decl.”), and the portions of the Motion relying on Kramer Decl. ¶ 29, require correction. Accordingly, Rambus requests that Your Honor accept the corrected versions of the Motion and Kramer Declaration filed herewith, as substitutes for the versions filed on April 14, 2003.

While the Motion and Kramer Decl. ¶ 29 reference R 204379, a document filed with the Court on April 14, 2003, the discussion actually refers to a different document – R 203479. It is R

204379 that requires *in camera* treatment should Complaint Counsel attempt to offer the document into evidence. The document that Mr. Kramer reviewed, R 203479, is a privileged document that was inadvertently produced. Instead of seeking *in camera* treatment for R 203479, Rambus seeks to have that document returned by Complaint Counsel.

In light of this error, Rambus respectfully seeks leave under Commission Rules of Practice 3.15(b) and 3.22, 16 C.F.R. §§ 3.15(b) and 3.22, to file the attached Corrected Motion For *In Camera* Treatment Of Documents That Complaint Counsel Identify As Potential Trial Exhibits (“Corrected Motion”), with a Proposed Order Granting the Corrected Motion, and a Corrected Declaration of Robert G. Kramer (“Corrected Declaration”).

The first paragraph of page 21 in the Corrected Motion revises the first paragraph of page 21 in the Motion to reflect the contents of R 204379 instead of R 203479. The entry for R 204379 at page 14 of Appendix A is changed to reflect the confidential information contained in R 204379 rather than R 203479. Finally, paragraphs 4 and 29 of the Declaration of Robert G. Kramer are changed to reflect the contents of R 204379 instead of R 203479.

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DATED: April __, 2003

Respectfully submitted,

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UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION

In the Matter of

RAMBUS INC.,

a corporation.

Docket No. 9302

PROPOSED ORDER
GRANTING RESPONDENT RAMBUS INC.'S MOTION FOR LEAVE TO FILE A
CORRECTED MOTION FOR *IN CAMERA* TREATMENT OF DOCUMENTS THAT
COMPLAINT COUNSEL IDENTIFY AS POTENTIAL TRIAL EXHIBITS

Having reviewed all papers filed with this motion, the Court hereby GRANTS Respondent Rambus's Motion For Leave To File A Corrected Motion for *In Camera* Treatment of Documents That Complaint Counsel Identify As Potential Trial Exhibits.

Accordingly, IT IS HEREBY ORDERED that Respondent Rambus Inc.'s Corrected Motion for *In Camera* Treatment of Documents That Complaint Counsel Identify As Potential Trial Exhibits and the Corrected Declaration of Robert G. Kramer, and all attachments thereto, shall be filed.

Date: _____

Stephen J. McGuire
Chief Administrative Law Judge

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION

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

CERTIFICATE OF SERVICE

I, Jacqueline M. Haberer, hereby certify that on April 17, 2003, I caused a true and correct copy of *Respondent Rambus Inc.'s Motion for Leave to File a Corrected Motion for In Camera Treatment of Documents That Complaint Counsel Identify as Potential Trial Exhibits* (and the related *Proposed Order*) to be served on the following persons by hand delivery:

Hon. Stephen J. McGuire
Chief Administrative Law Judge
Federal Trade Commission
Room H-112
600 Pennsylvania Avenue, N.W.
Washington, D.C. 20580

Donald S. Clark, Secretary
Federal Trade Commission
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Jacqueline M. Haberer

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION

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

CERTIFICATION

I, Jacqueline M. Haberer, hereby certify that the electronic copy of *Respondent Rambus Inc.'s Motion for Leave to File a Corrected Motion for In Camera Treatment of Documents That Complaint Counsel Identify as Potential Trial Exhibits* (and the related *Proposed Order*) accompanying this certification is a true and correct copy of the paper version that is being filed with the Secretary of the Commission on April 17, 2003 by other means:

Jacqueline M. Haberer
April 17, 2003