

UNITED STATES OF AMERICA
BEFORE FEDERAL TRADE COMMISSION

<p>In the Matter of</p> <p>RAMBUS INCORPORATED,</p> <p>a corporation.</p>	<p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p>	<p>DOCKET NO. 9302</p>
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**DECLARATION OF MICHAEL D. ERICKSON IN SUPPORT OF IBM'S
MOTION FOR RETURN OF PRIVILEGED DOCUMENTS INADVERTENTLY
PRODUCED**

I, Michael D. Erickson, declare as follows:

1. I am an associate with Hogan & Hartson, L.L.P., attorneys for International Business Machines Corporation ("IBM") herein. I have personal knowledge of the matters set forth in this declaration.

2. I participated in the review of IBM documents to be produced in response to a subpoena served on it by Rambus. I reviewed the box of documents from which document IBM/2 0812282 was produced. A true and correct copy of that document is attached herewith as Exhibit A. When I reviewed that document, I did not recognize that the recipient of the document, Robert Walsh, was an attorney as it was not evident from the face of the document and I neglected to look up this name on the complete list of IBM attorneys provided to me. As a result, this privileged document was mistakenly produced.

PUBLIC VERSION

I declare, under penalty of perjury of the laws of the United States, that the foregoing is true and correct.

Executed this 14th day of April, 2003 at Washington, D.C.

A handwritten signature in black ink, appearing to read "Michael D. Erickson", written over a horizontal line.

Michael D. Erickson

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