

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

In the Matter of	)	
	)	
RAMBUS INC.,	)	<b>Docket No. 9302</b>
	)	
a corporation.	)	
	)	

**Complaint Counsel’s Preliminary Witness List**

Complaint Counsel hereby designates those persons currently contemplated to be called to testify as witnesses, orally in person or by deposition or investigational hearing transcript, at the hearing in this matter. Complaint Counsel reserves the right (1) not to call any of the persons listed herein to testify at the hearing, as circumstances may warrant; (2) to call as a witness any person identified as a witness by Respondent; (3) to designate additional witnesses as rebuttal witnesses, as needed depending upon issues raised by Respondent, in accordance with the terms of the Scheduling Order dated August 6, 2002; (4) to supplement or amend this preliminary witness list and any future rebuttal witness list to add any individual who is designated by a corporation or other organization to testify on its behalf in a deposition pursuant to Commission Rule of Practice 3.33(c); (5) to supplement or amend this preliminary witness list and any future rebuttal witness list to add any individual for the purpose of establishing the authenticity of documents; and (6) to supplement or amend this preliminary witness list and any future rebuttal witness list as permitted by the Commission’s Rules of Practice and by the terms of the Scheduling Order dated August 6, 2002.

Subject to these reservations of rights, Complaint Counsel’s preliminary list of witnesses is as follows:

1. Graham Allan  
formerly Business Unit Manager  
**Mosaid Technologies Incorporated**  
(currently Director of Marketing, SiberCore Technologies)
2. Steven Appleton  
Chairman of the Board of Directors, Chief Executive Officer and President  
**Micron Technology, Inc.**
3. Brian Barbara  
President  
**JAZiO Inc.**
4. Richard Barth  
self-employed  
(formerly Engineer, **Rambus Inc.**)
5. Andy Bechtolsheim  
Vice President and General Manager, Gigabit Systems  
**Cisco Systems, Inc.**
6. Henry Becker  
Managing Director  
**Infineon Technologies Richmond**
7. Reese Brown (by deposition and investigational hearing testimony)  
retired  
(formerly consultant to **JEDEC Solid State Technology Association**)
8. Richard Crisp  
formerly Technology and Business Development Manager, Asia-Pacific  
**Rambus Inc.**
9. Kevin Cutler  
Chief Technology Officer  
**Dell Computer Corporation**
10. Anthony Diepenbrock  
formerly in-house counsel  
**Rambus Inc.**

(currently Associate, Oppenheimer, Wolff & Donnelly LLP)

11. Charles Donohoe  
Senior Vice President & General Patent Counsel  
**Samsung Electronics Co., Ltd.**
12. Bob Goodman  
Chief Executive Officer  
**Kentron Technologies, Inc.**
13. Jackie Gross  
Director - Memory Central Direct Procurement  
**Hewlett-Packard Company**
14. Richard Heye  
Vice President, Platform Engineering & Infrastructure  
**Advanced Micro Devices, Inc.**
15. Gordon Kelley  
Senior Engineer  
**IBM Corporation**
16. John Kelly  
Executive Vice President and General Counsel  
**Electronic Industries Alliance**  
President  
**JEDEC Solid State Technology Association**
17. Mark Kellogg  
Distinguished Engineer  
**IBM Corporation**
18. Ilan Krashinsky  
Memory Technology Expert  
**Hewlett-Packard Company**
19. Thomas Landgraf  
DRAM Senior Procurement Engineer  
**Hewlett-Packard Company**

20. Terry Lee  
Executive Director – Advanced Technology and Strategic Marketing  
**Micron Technology, Inc.**
  
21. Joe Macri  
Director of Technology  
**ATI Technologies Inc.**
  
22. Pete MacWilliams  
Senior Fellow  
**Intel Corporation**
  
23. Willi Meyer  
Manager, Technology Marketing Division  
**Infineon Technologies AG**
  
24. Dr. K. H. Oh  
formerly Executive Vice President, Semiconductor Division  
**Hyundai Electronics Industries Co., Ltd.**  
(currently Professor, Korean Advanced Institute of Science & Technology)
  
25. Dr. Martin Peisl  
Director – Graphics and Specialty Memories  
**Infineon Technologies North America Corp.**
  
26. Steven Polzin  
Senior AMD Fellow  
**Advanced Micro Devices, Inc.**
  
27. Dr. Werner Reczek  
Vice President and Managing Director  
**Infineon Technologies AG**
  
28. Desi Rhoden  
President  
**Advanced Memory International, Inc.**
  
29. Gil Russell  
retired  
(formerly Technical Marketing Manager, **Infineon Technologies AG**; Senior Strategic

Marketing Engineer, **NEC Electronics Corp.**; and Senior Strategic Marketing Specialist, **Samsung Electronics Co., Ltd.** )

30. Brian Shirley  
Design Operations Manager  
**Micron Technology, Inc.**
31. Howard Sussman  
Senior Manager, Marketing & Development  
**Sanyo Semiconductor Corporation**
32. Farhad Tabrizi  
Vice President, Worldwide Marketing of Memory Products  
**Hynix Semiconductor Inc.**
33. Lester Vincent  
Partner  
**Blakely Sokoloff, Taylor & Zafman**
34. Barry Wagner  
Manager, Technical Marketing  
**nVIDIA Corporation**
35. Brett Williams  
Segment Enabling Specialist – Desktop PC  
**Micron Technology, Inc.**
36. Bryn Young  
Director, Graphics Board Products  
**nVIDIA Corporation**

In addition to the individuals listed above, Complaint Counsel expects to introduce into evidence at trial, as party admissions, portions of the prior deposition or trial testimony of various present or former directors, officers, employees or agents of Respondent Rambus Inc.

Respectfully submitted,

---

M. Sean Royall  
Geoffrey D. Oliver  
Malcolm L. Catt  
John C. Weber  
Robert P. Davis  
Cary E. Zuk  
Bureau of Competition  
Federal Trade Commission  
Washington, D.C. 20580  
(202) 326-2275  
(202) 326-3496 (fax)  
Counsel Supporting the Complaint

DATED: September 30, 2002