

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

In the Matter of

RAMBUS INC.,

a corporation.

Docket No. 9302

Complaint Counsel's Second Supplemental 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 supplemental 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. Bruce 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. Anthony Diepenbrock
formerly in-house counsel
Rambus Inc.
(currently Associate, Oppenheimer, Wolff & Donnelly LLP)
10. Charles Donohoe
Senior Vice President & General Patent Counsel

Samsung Electronics Co., Ltd.

11. Bruce Gehman
Vice President for Standards and Chief Technical Officer
Semiconductor Equipment and Materials International (SEMI)
12. William Gervasi
formerly Technology Analyst
Transmeta Corporation
13. Bob Goodman
Chief Executive Officer
Kentron Technologies, Inc.
14. Jackie Gross
Director - Memory Central Direct Procurement
Hewlett-Packard Company
15. Dean Hays
Director of Marketing
Via Technologies, Inc.
16. Richard Heye
Vice President, Platform Engineering & Infrastructure
Advanced Micro Devices, Inc.
17. Gordon Kelley
Senior Engineer
IBM Corporation
18. John Kelly
Executive Vice President and General Counsel
Electronic Industries Alliance
President
JEDEC Solid State Technology Association
19. Mark Kellogg
Distinguished Engineer
IBM Corporation

20. Kevin Kettler
Chief Technology Officer
Dell Computer Corporation

21. Ilan Krashinsky
Memory Technology Expert
Hewlett-Packard Company

22. Thomas Landgraf
DRAM Senior Procurement Engineer
Hewlett-Packard Company

23. Terry Lee
Executive Director – Advanced Technology and Strategic Marketing
Micron Technology, Inc.

24. Joe Macri
Director of Technology
ATI Technologies Inc.

25. Pete MacWilliams
Senior Fellow
Intel Corporation

26. Willi Meyer
Manager, Technology Marketing Division
Infineon Technologies AG

27. Dr. K. H. Oh
formerly Executive Vice President, Semiconductor Division
Hyundai Electronics Industries Co., Ltd.
(currently Professor, Korean Advanced Institute of Science & Technology)

28. Dr. Martin Peisl
Director – Graphics and Specialty Memories
Infineon Technologies North America Corp.

29. Steven Polzin
Senior AMD Fellow
Advanced Micro Devices, Inc.

30. Dr. Werner Reczek
Vice President and Managing Director
Infineon Technologies AG

31. Desi Rhoden
President
Advanced Memory International, Inc.

32. 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.**)

33. Brian Shirley
Design Operations Manager
Micron Technology, Inc.

34. Howard Sussman
Senior Manager, Marketing & Development
Sanyo Semiconductor Corporation

35. Farhad Tabrizi
Vice President, Worldwide Marketing of Memory Products
Hynix Semiconductor Inc.

36. Lester Vincent
Partner
Blakely Sokoloff, Taylor & Zafman

37. Barry Wagner
Manager, Technical Marketing
nVIDIA Corporation

38. Brett Williams
Segment Enabling Specialist – Desktop PC
Micron Technology, Inc.

39. 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

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