

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

**PUBLIC**

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

**Complaint Counsel's Final Witness List**

Complaint Counsel hereby designates those persons currently contemplated to be called to testify as witnesses, orally in person or by deposition 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 October 31, 2002, as revised; (4) to supplement or amend this witness list to add any individual for the purpose of establishing the authenticity of documents; and (5) to supplement or amend this witness list as permitted by the Commission's Rules of Practice and by the terms of the Scheduling Order dated October 31, 2002, as revised.

Subject to these reservations of rights, Complaint Counsel's list of witnesses currently contemplated to be called as part of Complaint Counsel's case in chief, as part of Complaint Counsel's rebuttal case, or both, 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. Andy Bechtolsheim  
Vice President and General Manager, Gigabit Systems  
**Cisco Systems, Inc.**
4. Henry Becker  
Managing Director  
**Infineon Technologies Richmond**
5. Reese Brown (by deposition testimony)  
retired  
(formerly consultant to **JEDEC Solid State Technology Association**)
6. Sam Calvin  
retired  
(formerly Senior Staff Electrical Engineer, **Intel Corporation**)
7. Richard Crisp (live and by deposition testimony)  
formerly Technology and Business Development Manager, Asia-Pacific  
**Rambus Inc.**
8. William Davidow (by deposition testimony)  
Director  
**Rambus, Inc.**
9. Anthony Diepenbrock  
formerly in-house counsel  
**Rambus Inc.**

(currently Partner, Oppenheimer, Wolff & Donnelly LLP)

10. Michael Farmwald (by deposition testimony)  
Director  
**Rambus, Inc.**
11. Bob Goodman  
Chief Executive Officer  
**Kentron Technologies, Inc.**
12. Jackie Gross  
Director - Memory Central Direct Procurement  
**Hewlett-Packard Company**
13. Craig Hampel (by deposition testimony)  
Technical Director  
**Rambus, Inc.**
14. Dean Hays  
Director of Marketing  
**Via Technologies, Inc.**
15. Richard Heye  
Vice President, Platform Engineering & Infrastructure  
**Advanced Micro Devices, Inc.**
16. Mark Horowitz (by deposition testimony)  
Director  
**Rambus, Inc.**
17. Dr. Bruce L. Jacob  
Associate Professor, Department of Electrical & Computer Engineering  
**University of Maryland**  
(expert witness)
18. Joel Karp (by deposition testimony)<sup>1</sup>  
formerly Vice President of Intellectual Property

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<sup>1</sup> Complaint Counsel believes that the deposition testimony of Mr. Karp is admissible as a party admission. In the event, however, that Complaint Counsel is precluded from introducing into evidence portions of Mr. Karp's prior testimony, Complaint Counsel reserves the right to call him as a live witness.

**Rambus, Inc.**

19. Gordon Kelley  
Senior Engineer  
**IBM Corporation**
20. John Kelly  
Executive Vice President and General Counsel  
**Electronic Industries Alliance**  
President  
**JEDEC Solid State Technology Association**
21. Mark Kellogg  
Distinguished Engineer  
**IBM Corporation**
22. Kevin Kettler  
Chief Technology Officer  
**Dell Computer Corporation**
23. Ilan Krashinsky  
Memory Technology Expert  
**Hewlett-Packard Company**
24. Thomas Landgraf  
Commodity Manager for Semiconductor Memories  
**Cisco Systems, Inc.**  
(formerly DRAM Senior Procurement Engineer, **Hewlett-Packard Company**)
25. Terry Lee  
Executive Director – Advanced Technology and Strategic Marketing  
**Micron Technology, Inc.**
26. Joe Macri  
Director of Technology  
**ATI Technologies Inc.**
27. Pete MacWilliams  
Senior Fellow  
**Intel Corporation**
28. Dr. R. Preston McAfee  
Professor, Department of Economics

**University of Texas**  
(expert witness)

29. Willi Meyer (by deposition testimony)  
Manager, Technology Marketing Division  
**Infineon Technologies AG**
30. David Mooring (by deposition testimony)  
President  
**Rambus, Inc.**
31. Mark E. Nusbaum  
Member  
**Nixon and Vanderhye, P.C.**  
(expert witness)
32. Dr. K. H. Oh (by deposition testimony)  
formerly Executive Vice President, Semiconductor Division  
**Hyundai Electronics Industries Co., Ltd.**  
(currently Professor, Korean Advanced Institute of Science & Technology)
33. Dr. Martin Peisl  
Director – Graphics and Specialty Memories  
**Infineon Technologies North America Corp.**
34. Steven Polzin  
Senior AMD Fellow  
**Advanced Micro Devices, Inc.**
35. Dr. Werner Reczek  
Vice President and Managing Director  
**Infineon Technologies AG**
36. Desi Rhoden  
President  
**Advanced Memory International, Inc.**
37. Brian Shirley  
Design Operations Manager  
**Micron Technology, Inc.**
38. Howard Sussman  
Senior Manager, Marketing & Development  
**Sanyo Semiconductor Corporation**

39. Farhad Tabrizi  
Vice President, Worldwide Marketing of Memory Products  
**Hynix Semiconductor Inc.**
40. Geoffrey Tate (by deposition testimony)  
Chief Executive Officer  
**Rambus, Inc.**
41. Lester Vincent  
Partner  
**Blakely Sokoloff, Taylor & Zafman**
42. Barry Wagner  
Manager, Technical Marketing  
**nVIDIA Corporation**
43. Fred Ware (by deposition testimony)  
Principal Engineer  
**Rambus, Inc.**
44. Brett Williams  
Segment Enabling Specialist – Desktop PC  
**Micron Technology, Inc.**

In addition to the witnesses listed above, Complaint Counsel designates the following individuals as witnesses who may be called as part of Complaint Counsel's rebuttal case, depending upon the evidence presented by Rambus:

1. Dan Bart  
Senior Vice President, Standards & Special Projects  
**Telecommunications Industry Association (TIA)**
2. David Chapman  
Vice President of Marketing  
**GSI Technology**  
(formerly Manager of Applications Engineering and Product Planning, **Motorola**)
3. Charles Donohoe  
Senior Vice President & General Patent Counsel

**Samsung Electronics Co., Ltd.**

4. Ken McGhee  
Director – Technical Affairs  
**JEDEC Solid State Technology Association**
  
5. Betty Prince  
Founder & Owner  
**Memory Strategies International**  
(formerly with **Texas Instruments** and Member, Board of Directors, **Mosaid Technologies Incorporated**)
  
6. 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.** )

Respectfully submitted,

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Counsel Supporting the Complaint

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