

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

COMMISSIONERS: Deborah Platt Majoras, Chairman  
Orson Swindle  
Thomas B. Leary  
Pamela Jones Harbour  
Jon Lebowitz

**In the Matter of**

**RAMBUS INC.,**

**a corporation.**

**Docket No. 9302**

**RESPONDENT RAMBUS INC.'S SCHEDULE OF  
PROPOSED EXHIBITS PURSUANT TO MAY 13, 2005 ORDER**

Pursuant to the Order issued on May 13, 2005 granting (in part) Complaint Counsel's motion to reopen the record, Respondent Rambus Inc. ("Rambus") respectfully submits the attached Schedule of Proposed Additional Trial Exhibits. Copies of the exhibits identified in the Schedule have been lodged separately.

Rambus has not designated any portion of the transcripts of the live testimony presented at trial, as Complaint Counsel stated that they intended to offer the transcripts in their entirety. Rambus reserves its right to submit objections to inadmissible portions pursuant to the Commission's scheduling order.

DATED: June \_\_, 2005

Respectfully submitted,

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**RESPONDENT RAMBUS INC.'S SCHEDULE  
OF PROPOSED ADDITIONAL TRIAL EXHIBITS**

<b>TRIAL EX.</b>	<b>SUMMARY DESCRIPTION</b>
RX-2500 (DTX 3681)	Notes of 2/12/98 meeting with lawyers at the Cooley Godward law firm with respect to patent licensing and document retention issues.
RX-2501 (DTX 3682)	Statement of services rendered by Cooley Godward firm in January-February 1998.
RX-2502 (DTX 3676)	Memorandum dated 3/19/98 provided to Rambus by Cooley Godward partner Diane Savage to assist Rambus in its development of a document retention policy.
RX-2503 (DTX 4028)	Rambus Document Retention Policy dated July 22, 1998.
RX-2504 (DTX 3686)	7/22/98 presentation by Cooley Godward partner Dan Johnson to Rambus managers regarding the need for a document retention policy and related litigation concerns.
RX-2505 (DTX 4024)	Presentation prepared by Rambus Vice President Joel Karp and approved by Dan Johnson regarding the document retention policy and the need for employees to "Look for things to keep" and for "Reasons to keep it."
RX-2506 (DTX 3708)	1/15/01 email by Rambus CEO Geoff Tate stating that FTC had initiated preliminary investigation and had requested that Rambus retain relevant documents.
RX-2507 (DTX 8012)	Gray Cary notes dated 2/1/00 describing interview of outside patent counsel Lester Vincent and his practice of cleaning out his patent prosecution files upon patent issuance.
RX-2508 (DTX 3791)	2/1/00 cover letter by Lester Vincent transmitting a copy of many of his files to Rambus General counsel Neil Steinberg.
RX-2509 (DTX 3924)	5/11/00 Gray Cary letter transmitting "seven boxes containing files of Lester Vincent" to Rambus outside counsel Cecilia Gonzalez of Howrey Simon.
RX-2510 (DTX 3873)	10/25/00 letter showing shipment by Howrey Simon to Gray Cary of "nonprivileged Blakeley Sokoloff (Lester Vincent) documents."
RX-2511 (DTX 3728)	4/8/01 email by Rambus General Counsel Neil Steinberg to Rambus executives communicating information that Lester Vincent's privileged files had been misplaced for several months as a result of file transfers between the Gray Cary and Howrey Simon firms.
RX-2512 (DTX 3694)	Joel Karp's "IP Top Level Goals" for "Q298."

<b>TRIAL EX.</b>	<b>SUMMARY DESCRIPTION</b>
RX-2513 (DTX 3696)	Joel Karp's "IP Q3'98 Goals (First Cut)."
RX-2514 (DTX 3713)	Joel Karp's "IP Q2'99 Goals – Final 3/29/99."
RX-2515 (DTX 4067)	Joel Karp's "IP Q3'99 Goals – First Cut 6/27/99."
RX-2516 (PTX 9526)	Video excerpts from 8/7/01 deposition of former Rambus Vice President Joel Karp.
RX-2517	Paper copy of Karp 8/7/01 deposition excerpts contained in RX 2516.
RX-2518 (PTX 9527)	Video excerpts from 10/8/04 deposition of Mr. Karp.
RX-2519	Paper copy of Karp 10/8/04 deposition excerpts contained in RX 2518.
(RX-2520)	Paper copy of excerpts from 10/14/04 deposition of former Rambus Vice President Allen Roberts (DTX 9011).
(RX-2521)	Paper copy of excerpts from 11/23/04 deposition of Rambus outside counsel Dan Johnson (DTX 9023).
(RX-2522) (PTX 9525)	Video excerpts from 11/23/04 deposition of Mr. Johnson.
(RX-2523)	Paper copy of Johnson 11/23/04 deposition excerpts contained in RX 2522.
(RX-2524) (PTX 9503)	Video excerpts from 2/26/04 deposition of former Rambus engineer Richard Barth.
(RX-2525)	Paper copy of Barth 2/26/04 deposition excerpts contained in RX 2524.
(RX-2526) (PTX 9505)	Video excerpts from 11/9/00 deposition of former Rambus employee Richard Crisp.
(RX-2527)	Paper copy of Crisp 11/9/00 deposition excerpts contained in RX 2526.
(RX-2528) (PTX 9509)	Video excerpts from 10/11/04 deposition of former Rambus in-house lawyer Anthony Diepenbrock.

<b>TRIAL EX.</b>	<b>SUMMARY DESCRIPTION</b>
(RX-2529)	Paper copy of Diepenbrock 10/11/04 deposition excerpts contained in RX 2528.
(RX-2530) (PTX 9510)	Video excerpts from 10/9/01 deposition of former Rambus outside counsel Lester Vincent.
(RX-2531)	Paper copy of Vincent 10/9/01 deposition excerpts contained in RX 2530.
(RX-2532) (PTX 9511)	Video excerpts from 10/15/04 deposition of Mr. Vincent.
(RX-2533)	Paper copy of Vincent 10/15/04 deposition excerpts contained in RX 2532.
(RX-2534) (PTX 9514)	Video excerpts from 10/14/04 deposition of former Rambus Vice-President Allen Roberts.
(RX-2535)	Paper copy of Roberts 10/14/04 deposition excerpts contained in RX 2534.
(RX-2536) (PTX 9515)	Video excerpts from 5/28/04 deposition of Rambus Technical Director Craig Hampel.
(RX-2537)	Paper copy of Hampel 5/28/04 deposition excerpts contained in RX 2536.
(RX-2538) (PTX 9516)	Video excerpts from 8/1/01 deposition of Rambus's General Counsel Neil Steinberg.
(RX-2539)	Paper copy of Steinberg 8/1/01 deposition excerpts contained in RX 2538.
(RX-2540) (PTX 9517)	Video excerpts from 10/6/04 deposition of Mr. Steinberg.
(RX-2541)	Paper copy of Steinberg 10/6/04 deposition excerpts contained in RX 2540.
(RX-2542) (PTX 9518)	Video excerpts from 10/14/04 deposition of Rambus executive David Mooring.
(RX-2543)	Paper copy of Mooring 10/14/04 deposition excerpts contained in RX 2542.
(RX-2544) (PTX 9519)	Video excerpts from 10/13/04 deposition of former Rambus outside counsel Peter Leal.

<b>TRIAL EX.</b>	<b>SUMMARY DESCRIPTION</b>
(RX-2545)	Paper copy of Leal 10/13/04 deposition excerpts contained in RX 2544.
(RX-2546) (PTX 9522)	Video excerpts from 5/18/04 deposition of Rambus HR manager Melinda Kaufman.
(RX-2547)	Paper copy of Kaufman 5/18/04 deposition excerpts contained in RX 2546.
(RX-2548) (PTX 9523)	Video excerpts from 5/18/04 deposition of former Rambus HR manager Ed Larsen.
(RX-2549)	Paper copy of Larsen 5/18/04 deposition excerpts contained in RX 2548.
(RX-2550) (PTX 9524)	Video excerpts from 5/28/04 deposition of Rambus Vice President Laura Stark.
(RX-2551)	Paper copy of Stark 5/28/04 deposition excerpts contained in RX 2550.
(RX-2552)	Demonstratives used by Rambus at trial. <sup>1</sup>
(RX-2553)	Rambus's [Proposed] Findings of Fact with Respect to Infineon's Unclean Hands Defense. <sup>1</sup>

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<sup>1</sup> Rambus does not believe that demonstratives and arguments of counsel are properly considered to be evidence, and submits its demonstratives and proposed findings only because Complaint Counsel stated their intention to offer the demonstratives and other materials prepared by Infineon's counsel. Rambus reserves its right to object to such materials in accordance with the Commission's scheduling orders.