UNITED STATES OF AMERICA
BEFORE FEDERAL TRADE COMMISSION

COMMISSIONERS: Deborah Platt Majoras, Chairman
Thomas B. Leary
Pamela Jones Harbour
Jon Leibowitz

In the Matter of RAMBUS INCORPORATED, a corporation.	Docket No. 9302 **PUBLIC**

COMPLAINT COUNSEL'S RESPONSE TO RAMBUS'S PROPOSED EXHIBITS FROM THE UNCLEAN HANDS HEARING

The Commission's Order of May 13, 2005, requires that Complaint Counsel and Rambus by July 8, 2005, each file any objections to the respective exhibits proposed by the other pursuant to the Commission's Order.

Complaint Counsel have reviewed the exhibits proposed by Rambus, and have conferred with Rambus counsel concerning potential objections to the parties' respective proposed exhibits. After such consultation, Complaint Counsel have concluded that issues concerning the substance, relevance and importance of the exhibits proposed by Rambus are best addressed in the context of possible proposed findings as contemplated by the Commission's Order (Order at 4, n.6) rather than as objections to the admission of the exhibits themselves. We understand that counsel for Rambus has a similar view with respect to the exhibits proposed by Complaint Counsel. Complaint Counsel therefore do not object to admission of the exhibits proposed by Rambus pursuant to the Commission's Order.

Complaint Counsel note that deposition testimony proposed by Rambus for inclusion in the record has been submitted in the form of written transcripts and video clips. Complaint Counsel also have proposed deposition testimony for inclusion in the record, in the form of written transcripts alone. At the time that this deposition testimony was submitted by Complaint Counsel, Complaint Counsel were not in possession of video versions. In order to provide the Commission with both transcript and video versions of all of the testimony proposed as exhibits by both Rambus and Complaint Counsel, Complaint Counsel have been attempting to secure video versions of these transcript designations. If and when accurate video versions are obtained, Complaint Counsel intend to seek the leave of the Commission to add the video versions of the designated transcripts. Complaint Counsel understand that counsel for Rambus do not object in principle to such a submission.

Respectfully submitted,

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Geoffrey D. Oliver
Patrick J. Roach
Robert P. Davis

Bureau of Competition
FEDERAL TRADE COMMISSION
Washington, D.C. 20001
(202) 326-2275

Counsel for the Complaint

July 8, 2005

CERTIFICATE OF SERVICE

I, Beverly A. Dodson, hereby certify that on July 8, 2005, I caused a copy of the attached, *Complaint Counsel's Response to Rambus's Proposed Exhibits from the Unclean Hands Hearing,* to be served upon the following persons:

by hand delivery to:

The Commissioners
U.S. Federal Trade Commission
via Office of the Secretary, Room H-159
Federal Trade Commission
600 Pennsylvania Ave., N.W.
Washington, D.C. 20580

and by electronic transmission and overnight courier to:

A. Douglas Melamed, Esq.
Wilmer Cutler Pickering Hale and Dorr LLP
2445 M Street, N.W.
Washington, DC 20037-1402

Gregory P. Stone, Esq.
Munger, Tolles & Olson LLP
355 South Grand Avenue
35th Floor
Los Angeles, CA 90071

Counsel for Rambus Incorporated

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Beverly A. Dodson