

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

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

In the Matter of

RAMBUS INC.,

a corporation.

Docket No. 9302

**NOTICE OF FILING OF CORRECTED VERSION
OF RESPONSE BY RAMBUS INC. TO
COMPLAINT COUNSEL'S MOTION FOR SANCTIONS**

Respondent Rambus Inc. (“Rambus”) respectfully submits this notice that it has this day filed a corrected version of its Response by Rambus Inc. to Complaint Counsel’s Motion for Sanctions. The corrections to the brief were necessitated in part to correct errors in text and in part to correct formatting and pagination problems resulting from the conversion of the brief from Word to WordPerfect.

The corrections to the text are as follows:

PAGE	CORRECTION
1	The words “Summary Argument” in the heading have been changed to “Summary Of Argument”.
17 and 34	The references to Rambus’s General Counsel have been changed to reflect Mr. Steinberg’s correct title, Vice President of Intellectual Property and General Patent Counsel.
18	The words “in 1992 and 1993” in paragraph 31 have been changed to “between 1991 and 1993”.
35	The phrase “Complaint Counsel insist that ‘Rambus employees destroyed all of their JEDEC-related paper files.’ Mot. At 45;” has been changed to “Complaint Counsel insist that Rambus JEDEC representative Richard Crisp destroyed ‘anything he had on paper in his office.’ CCSF 114.”
35	The paragraph that begins with the word “ <i>Second</i> ” has been changed to “ <i>Second</i> , Complaint Counsel suggest that the JEDEC-related documents that Rambus did locate and produce in litigation survived ‘accidentally.’ CCSF 115, 122; Motion at 20. The record evidence, however, shows that” The former footnote nine on this page referred to an <i>Infineon</i> matter and has been deleted.
39	The phrase that begins “ <i>See Factual Summary</i> ” has been changed to “ <i>See RSF 1667-1672; RRSF 64.</i> ⁹ As the <i>Infineon</i> court”
39	In former footnote 10 (now footnote 9), the fourth and fifth sentences have been deleted, and a citation in the first sentence was corrected.

DATED: August 19, 2005

Respectfully submitted,



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CERTIFICATE OF SERVICE

I, Rebecca Read, hereby certify that on August 19, 2005, I caused a true and correct copy of the *Notice Of Filing Of Corrected Version Of Response By Rambus Inc. To Complaint Counsel's Motion For Sanctions* to be served on the following persons by hand delivery:

Hon. Stephen J. McGuire
Chief Administrative Law Judge
Federal Trade Commission
Room H-112
600 Pennsylvania Avenue, N.W.
Washington, D.C. 20580

Donald S. Clark, Secretary
Federal Trade Commission
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