

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

In the Matter of

RAMBUS INCORPORATED,

a corporation.

Docket No. 9302

**JOINT MOTION
FOR ENTRY OF REVISED SCHEDULING ORDER**

Complaint Counsel and Counsel representing Respondent Rambus Inc. hereby jointly request that Your Honor approve the proposed Revised Scheduling Order attached to this motion. The proposed scheduling changes consist primarily of (1) extending the deadline for Complaint Counsel's service of expert reports from November 25 to December 10; (2) extending all other dates between October 29 and December 15 by two weeks; (3) extending the deadline for Respondent's counsel to serve its expert reports from December 16 to January 7; and (4) thereafter extending all other dates in the current schedule by three weeks. Under this proposed Revised Scheduling Order, the administrative hearing in this case, currently scheduled to commence on February 26, 2003, would begin on March 19.

The genesis of this proposed revision of the current Scheduling Order relates to unexpected problems concerning the availability of an expert witness. When this issue first arose, counsel for both parties quickly conferred and determined that, in light of the very substantial amount of discovery that is scheduled to occur in November and December, the proposal described above is the best apparent

solution to these unanticipated expert witness scheduling problems.

In jointly making this proposal to Your Honor, neither side wishes to prejudice its right to make (or oppose) any future argument or motion concerning scheduling issues or otherwise. Both sides, however, do wish to recognize that the level of cooperation that led to this joint proposal has been extended to other aspects of the litigation. Notwithstanding the issue that precipitated the current proposal, the litigation currently is proceeding at a rapid pace consistent with the Scheduling Order that is now in place and with the Commission's Rules of Practice.

Counsel have no other issues to raise before Your Honor at this time. We do, however, respectfully request a prompt ruling on this motion to ensure that appropriate steps can be made to coordinate compliance with Your Honor's ruling.

Respectfully submitted,

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