

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION

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

DECLARATION OF BRIAN SHIRLEY

I, Brian Shirley, based upon my personal knowledge concerning matters to which I am competent to testify, hereby declare as follows:

1. I am Design Operations Manager for the Computing and Consumer Group at Micron Technology, Inc. (“Micron”).
2. Micron is not a party to the captioned matter.
3. I have reviewed the documents for which Micron seeks in camera treatment. I also provided Complaint Counsel with the Micron confidential information that is incorporated in these documents. Based upon my review of these documents, my knowledge of Micron’s business, and my familiarity with the confidentiality protection that Micron affords information of this type, it is my belief that disclosure of these documents to the public and to non-legal employees of Rambus would likely cause substantial commercial harm to Micron.

5. The documents in question contain highly sensitive, non-public information regarding Micron's [cost structure, historical output, etc.] This information is held in strict confidence by Micron technology.

8. I believe that if the confidential information in these documents is disclosed to the public, Micron is likely to suffer serious competitive harm because competitors, including Rambus, would have access to information that could allow them to shape their pricing or other competitive strategies to take advantage of non-public facts about Micron's capacity and costs.

I declare under penalty of perjury under the Laws of the United States of America that the foregoing is true and correct. Executed this ____ day of June, 2003 in Washington, District of Columbia.

Brian Shirley

Micron Technology, Inc.