UNITED STATES OF AMERICA BEFORE FEDERAL TRADE COMMISSION

COMMISSIONERS:

Timothy J. Muris, Chairman Mozelle W. Thompson Orson Swindle Thomas B. Leary Pamela Jones Harbour

In the Matter of

RAMBUS INCORPORATED,

Docket No. 9302

a corporation.

<u>COMPLAINT COUNSEL'S MOTION FOR LEAVE TO FILE</u> <u>APPENDICES TO AID COMMISSION REVIEW</u>

Complaint Counsel respectfully request leave to file the attached appendices with the Appeal Brief in this matter, notwithstanding the word limit set forth in the Commission's March 18, 2004, Order.

The appendices contain information Complaint Counsel believe will assist the Commission in its review of the Initial Decision in this matter. In preparing these appendices, Complaint Counsel have endeavored to compile objective information in a format that will be useful to the Commissioners and their staffs in familiarizing themselves with the administrative record.

Appendix A is a glossary of terms, including technical terms, frequently used in the record in this case. The Commission's rules contemplate that such a glossary may be submitted and will not be counted against the word limit. 16 C.F.R. 3.52(b)(v)(2).

Appendix B is a witness index that provides brief descriptions of the witnesses who

testified live or via deposition at the hearing. It substantially tracks the Joint Witness Index filed below on September 5, 2003, pursuant to 16 C.F.R. § 3.46(c). The only changes to the content have been updating information regarding the witness's employment status and removing citations for easier reading.

Appendix C is a lengthy table referring to each finding of fact in the Initial Decision. The table identifies where possible the party's proposed fact finding below on which each Initial Decision finding appears to be based. The table also includes references to corresponding reply findings submitted by the opposing party. The table is intended to provide a means of reference where possible to the views of both parties, as expressed below, about the record evidence underlying each of the Initial Decision findings of fact.

Because Complaint Counsel believe these appendices will assist the Commission's analysis, we respectfully request that the Commission grant leave to file the attached appendices notwithstanding the page limit set forth in the Commission's March 18, 2004, Order.

Respectfully submitted,

Geoffrey D. Oliver Patrick J. Roach Lisa D. Rosenthal

Counsel Supporting the Complaint

Dated: April 16, 2004