# UNITED STATES OF AMERICA BEFORE FEDERAL TRADE COMMISSION

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

# Complaint Counsel's Supplemental Preliminary Witness List

Complaint Counsel hereby designates those persons currently contemplated to be called to testify as witnesses, orally in person or by deposition or investigational hearing transcript, at the hearing in this matter. Complaint Counsel reserves the right (1) not to call any of the persons listed herein to testify at the hearing, as circumstances may warrant; (2) to call as a witness any person identified as a witness by Respondent; (3) to designate additional witnesses as rebuttal witnesses, as needed depending upon issues raised by Respondent, in accordance with the terms of the Scheduling Order dated August 6, 2002; (4) to supplement or amend this preliminary witness list and any future rebuttal witness list to add any individual who is designated by a corporation or other organization to testify on its behalf in a deposition pursuant to Commission Rule of Practice 3.33(c); (5) to supplement or amend this preliminary witness list and any future rebuttal witness list to add any individual for the purpose of establishing the authenticity of documents; and (6) to supplement or amend this preliminary witness list and any future rebuttal witness list as permitted by the Commission's Rules of Practice and by the terms of the Scheduling Order dated August 6, 2002.

Subject to these reservations of rights, Complaint Counsel's supplemental preliminary list of witnesses is as follows:

### 1. Graham Allan

formerly Business Unit Manager

# **Mosaid Technologies Incorporated**

(currently Director of Marketing, SiberCore Technologies)

## 2. Steven Appleton

Chairman of the Board of Directors, Chief Executive Officer and President **Micron Technology, Inc.** 

#### 3. Brian Barbara

President

JAZiO Inc.

### 4. Richard Barth

self-employed

(formerly Engineer, **Rambus Inc.**)

## 5. Andy Bechtolsheim

Vice President and General Manager, Gigabit Systems

Cisco Systems, Inc.

# 6. Henry Becker

Managing Director

# **Infineon Technologies Richmond**

7. Reese Brown (by deposition and investigational hearing testimony)

retired

(formerly consultant to **JEDEC Solid State Technology Association**)

# 8. Richard Crisp

formerly Technology and Business Development Manager, Asia-Pacific

Rambus Inc.

### 9. Kevin Cutler

Chief Technology Officer

**Dell Computer Corporation** 

# 10. Anthony Diepenbrock

formerly in-house counsel

Rambus Inc.

# (currently Associate, Oppenheimer, Wolff & Donnelly LLP)

### 11. Charles Donohoe

Senior Vice President & General Patent Counsel

Samsung Electronics Co., Ltd.

### 12. Bruce Gehman

Vice President for Standards and Chief Technical Officer

Semiconductor Equipment and Materials International (SEMI)

### 13. William Gervasi

formerly Technology Analyst

**Transmeta Corporation** 

### 14. Bob Goodman

Chief Executive Officer

Kentron Technologies, Inc.

### 15. Jackie Gross

Director - Memory Central Direct Procurement

**Hewlett-Packard Company** 

# 16. Richard Heye

Vice President, Platform Engineering & Infrastructure

**Advanced Micro Devices, Inc.** 

# 17. Gordon Kelley

Senior Engineer

**IBM Corporation** 

## 18. John Kelly

Executive Vice President and General Counsel

**Electronic Industries Alliance** 

President

**JEDEC Solid State Technology Association** 

# 19. Mark Kellogg

Distinguished Engineer

**IBM Corporation** 

## 20. Ilan Krashinsky

Memory Technology Expert

# **Hewlett-Packard Company**

# 21. Thomas Landgraf

DRAM Senior Procurement Engineer

**Hewlett-Packard Company** 

## 22. Terry Lee

Executive Director – Advanced Technology and Strategic Marketing

Micron Technology, Inc.

## 23. Joe Macri

Director of Technology

ATI Technologies Inc.

### 24. Pete MacWilliams

Senior Fellow

**Intel Corporation** 

## 25. Willi Meyer

Manager, Technology Marketing Division

Infineon Technologies AG

### 26. Dr. K. H. Oh

formerly Executive Vice President, Semiconductor Division

# Hyundai Electronics Industries Co., Ltd.

(currently Professor, Korean Advanced Institute of Science & Technology)

### 27. Dr. Martin Peisl

Director – Graphics and Specialty Memories

Infineon Technologies North America Corp.

## 28. Steven Polzin

Senior AMD Fellow

**Advanced Micro Devices, Inc.** 

### 29. Dr. Werner Reczek

Vice President and Managing Director

**Infineon Technologies AG** 

## 30. Desi Rhoden

President

Advanced Memory International, Inc.

## 31. Gil Russell

retired

(formerly Technical Marketing Manager, **Infineon Technologies AG**; Senior Strategic Marketing Engineer, **NEC Electronics Corp.**; and Senior Strategic Marketing Specialist, **Samsung Electronics Co., Ltd.**)

# 32. Brian Shirley

Design Operations Manager

Micron Technology, Inc.

### 33. Howard Sussman

Senior Manager, Marketing & Development

**Sanyo Semiconductor Corporation** 

# 34. Farhad Tabrizi

Vice President, Worldwide Marketing of Memory Products

Hynix Semiconductor Inc.

## 35. Lester Vincent

Partner

Blakely Sokoloff, Taylor & Zafman

## 36. Barry Wagner

Manager, Technical Marketing

**nVIDIA Corporation** 

## 37. Brett Williams

Segment Enabling Specialist – Desktop PC

Micron Technology, Inc.

## 38. Bryn Young

Director, Graphics Board Products

**nVIDIA** Corporation

In addition to the individuals listed above, Complaint Counsel expects to introduce into evidence at trial, as party admissions, portions of the prior deposition or trial testimony of various present or former directors, officers, employees or agents of Respondent Rambus Inc.

Respectfully submitted,

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DATED: October 2, 2002