UNITED STATES OF AMERICA BEFORE FEDERAL TRADE COMMISSION

Public Document

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| In the Matter of |) |
| |) |
| RAMBUS INC., |) |
| |) |
| a corporation. |) |
| |) |

Docket No. 9302

Complaint Counsel's Preliminary Rebuttal Witness List

Complaint Counsel hereby designates those persons currently contemplated to be called to testify as rebuttal witnesses, orally in person or by deposition or investigational hearing transcript, at the hearing in this matter. All individuals on this list are also included in Complaint Counsel's Second Supplemental Preliminary Witness List, filed on October 22, 2002; no additional witnesses have been included. 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 any person listed herein either as a witness in its case in chief, or as a rebuttal witness, or both, as needed depending upon the issues raised by Respondent; (3) to call as a witness in its case in chief, or as a rebuttal witness, or both, any person identified as a witness or a rebuttal witness by Respondent; (4) to supplement or amend its preliminary witness list and this preliminary 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)as needed depending upon issues raised by Respondent, in accordance with the terms of the Scheduling Order dated August 6, 2002; (5) to supplement or amend its preliminary witness list and this preliminary rebuttal witness list to add any individual for the purpose of establishing the authenticity of documents; and (6) to supplement or amend its preliminary witness list and this preliminary rebuttal witness list as permitted by the Commission's Rules of Practice and by the terms of the Revised Scheduling Order dated October 31, 2002.

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

- Graham Allan formerly Business Unit Manager Mosaid Technologies Incorporated (currently Director of Marketing, SiberCore Technologies)
- Steven Appleton Chairman of the Board of Directors, Chief Executive Officer and President Micron Technology, Inc.
- 3. Bruce Barbara President JAZiO Inc.
- 4. Richard Barth self-employed (formerly Engineer, **Rambus Inc.**)
- Andy Bechtolsheim
 Vice President and General Manager, Gigabit Systems
 Cisco Systems, Inc.
- Henry Becker
 Managing Director
 Infineon Technologies Richmond
- Reese Brown (by deposition and investigational hearing testimony) retired (formerly consultant to JEDEC Solid State Technology Association)
- Richard Crisp formerly Technology and Business Development Manager, Asia-Pacific Rambus Inc.
- 9. Anthony Diepenbrock formerly in-house counsel

Rambus Inc.

(currently Associate, Oppenheimer, Wolff & Donnelly LLP)

- Charles Donohoe
 Senior Vice President & General Patent Counsel
 Samsung Electronics Co., Ltd.
- Bruce Gehman
 Vice President for Standards and Chief Technical Officer
 Semiconductor Equipment and Materials International (SEMI)
- 12. William Gervasi formerly Technology Analyst **Transmeta Corporation**
- Bob Goodman
 Chief Executive Officer
 Kentron Technologies, Inc.
- 14. Jackie Gross Director - Memory Central Direct Procurement Hewlett-Packard Company
- Dean Hays Director of Marketing Via Technologies, Inc.
- Richard Heye
 Vice President, Platform Engineering & Infrastructure
 Advanced Micro Devices, Inc.
- 17. Gordon Kelley Senior EngineerIBM Corporation
- John Kelly Executive Vice President and General Counsel Electronic Industries Alliance President JEDEC Solid State Technology Association

- Mark Kellogg
 Distinguished Engineer
 IBM Corporation
- 20. Kevin Kettler Chief Technology Officer **Dell Computer Corporation**
- 21. Ilan Krashinsky Memory Technology Expert Hewlett-Packard Company
- 22. Thomas Landgraf DRAM Senior Procurement Engineer Hewlett-Packard Company
- 23. Terry Lee Executive Director – Advanced Technology and Strategic Marketing **Micron Technology, Inc.**
- 24. Joe Macri Director of Technology ATI Technologies Inc.
- 25. Pete MacWilliams Senior Fellow Intel Corporation
- 26. Willi Meyer Manager, Technology Marketing Division Infineon Technologies AG
- 27. Dr. K. H. Oh formerly Executive Vice President, Semiconductor Division
 Hyundai Electronics Industries Co., Ltd. (currently Professor, Korean Advanced Institute of Science & Technology)
- Dr. Martin Peisl
 Director Graphics and Specialty Memories
 Infineon Technologies North America Corp.

- 29. Steven Polzin Senior AMD Fellow Advanced Micro Devices, Inc.
- 30. Dr. Werner Reczek Vice President and Managing Director Infineon Technologies AG
- 31. Desi Rhoden
 President
 Advanced Memory International, Inc.
- 32. Gil Russell retired (formerly Tec

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

- 33. Brian Shirley Design Operations Manager Micron Technology, Inc.
- Howard Sussman
 Senior Manager, Marketing & Development
 Sanyo Semiconductor Corporation
- Farhad Tabrizi
 Vice President, Worldwide Marketing of Memory Products
 Hynix Semiconductor Inc.
- 36. Lester Vincent
 Partner
 Blakely Sokoloff, Taylor & Zafman
- 37. Barry WagnerManager, Technical MarketingnVIDIA Corporation
- 38. Brett Williams

Segment Enabling Specialist – Desktop PC Micron Technology, Inc.

39. Bryn YoungDirector, Graphics Board ProductsnVIDIA Corporation

In addition to the individuals listed above, Complaint Counsel reserves the right to introduce into evidence as part of its rebuttal case, 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,

M. Sean Royall Geoffrey D. Oliver Malcolm L. Catt John C. Weber Robert P. Davis Cary E. Zuk Bureau of Competition Federal Trade Commission Washington, D.C. 20580 (202) 326-2275 (202) 326-3496 (fax) Counsel Supporting the Complaint

DATED: November 18, 2002