

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

In the Matter of

RAMBUS INCORPORATED,

a corporation.

Docket No. 9302

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE PUBLIC RECORD
VERSION OF COMPLAINT COUNSEL'S MOTION FOR DEFAULT JUDGMENT**

On December 20, 2002, Complaint Counsel filed in this matter a Motion for Default Judgment Relating to Respondent Rambus Inc.'s Willful, Bad-Faith Destruction of Material Evidence. Pursuant to Title 16, Sections 3.22 and 3.45 of the Code of Federal Regulation, Complaint Counsel must file with the Commission's Secretary a public version of its Motion for Default Judgment, and all supporting materials, within five (5) days after the original filing.

By this motion, which counsel for Respondent Rambus Inc. does not oppose, Complaint Counsel seeks an extension of time within which to file a public record version of its Motion for Default Judgment. The reason for requesting such an extension of time relates to the fact that Complaint Counsel and Rambus's counsel are presently in the process of conferring, in good faith, to resolve questions relating to Rambus's prior designation of certain materials, cited by the Motion for Default Judgment, as "confidential" pursuant to the Protective Order approved by Your Honor in this case. Complaint Counsel anticipates that we will have resolved this issue to the fullest extent possible with

Rambus's counsel by January 21, 2003, at which time we either (1) will be in a position to file a public record version of the Default Judgment Motion, or (2) will need to raise with Your Honor, following the procedure contemplated by Paragraph 11(b) of the Protective Order, unresolved issues pertaining to the appropriateness of certain confidentiality designations.

Thus, Complaint Counsel requests that it be granted an extension of time within which to file a public record version of its Motion for Default Judgment, to and including January 21, 2003, or until such time as Your Honor has had an opportunity to rule upon confidentiality issues that may be left unresolved by the parties' current efforts to confer in good faith.

Respondent's counsel does not oppose this motion.

Accordingly, Complaint Counsel requests that this motion be granted.

Respectfully submitted,

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Dated: December 30, 2002