

UNITED STATES OF AMERICA  
BEFORE THE FEDERAL TRADE COMMISSION

COMMISSIONERS: Deborah Platt Majoras, Chairman  
Pamela Jones Harbour  
Jon Leibowitz  
William E. Kovacic  
J. Thomas Rosch



In the Matter of  
  
RAMBUS INC.,  
  
a corporation.

Docket No. 9302

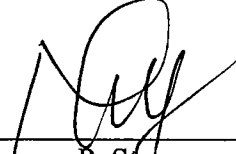
**MOTION OF RESPONDENT RAMBUS INC. FOR LEAVE TO FILE RESPONSE TO  
BRIEF OF AMICI CURIAE MICRON TECHNOLOGY, INC., SAMSUNG  
ELECTRONICS CORPORATION, LTD., AND HYNIX SEMICONDUCTOR, INC.**

As explained in Rambus's Opposition to the Motion by Micron Technology, Inc., Samsung Electronics Corporation, Ltd., and Hynix Semiconductor, Inc. for Leave to File Brief as Amici Curiae, the Commission should reject the proposed brief of amici curiae ("Amicus Brief") as untimely and needlessly repetitive of Complaint Counsel's filings. In the alternative, Rambus hereby moves for leave to file the attached Response to the Amicus Brief.

The Amicus Brief misconstrues the effect of the Commission's Order, misconceives the scope of the Commission's remedial authority, and misstates both the state of the DRAM industry and the potential impact of the Order on Rambus and that industry. Rambus therefore believes a responsive submission would materially aid the Commission in understanding the issues before it.

Accordingly, if the Commission grants the Amici's motion for leave to file their Amicus Brief, Rambus submits that the Commission should also accept the attached Response to the Amicus Brief.

Respectfully submitted,



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Gregory P. Stone  
Steven M. Perry  
MUNGER, TOLLES & OLSON LLP  
355 South Grand Avenue, 35th Floor  
Los Angeles, California 90071-1560  
(213) 683-9100

A. Douglas Melamed  
Paul R.Q. Wolfson  
WILMER CUTLER PICKERING  
HALE AND DORR LLP  
1875 Pennsylvania Avenue, N.W.  
Washington, D.C. 20006  
(202) 663-6000

Attorneys for Respondent Rambus Inc.

March 9, 2007

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

COMMISSIONERS: Deborah Platt Majoras, Chairman  
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**Docket No. 9302**

**[PROPOSED] ORDER GRANTING LEAVE TO RESPONDENT  
RAMBUS INC. TO FILE RESPONSE TO BRIEF OF *AMICI CURIAE*  
MICRON TECHNOLOGY, INC., SAMSUNG ELECTRONICS  
CORPORATION, LTD., AND HYNIX SEMICONDUCTOR, INC.**

Upon consideration of Respondent Rambus Inc.'s Motion for Leave to File a Response to the Brief of Amici Curiae Micron Technology, Inc., Samsung Electronics Corporation, Ltd., and Hynix Semiconductor, Inc. in Opposition to Rambus's Motion to Reconsider the Commission's Remedy Order in the Matter of Rambus Inc.,

**IT IS ORDERED** that Respondent's motion is **GRANTED**. The Response attached to Respondent's motion shall be deemed timely filed as of the date of this Order.

By the Commission.

Donald S. Clark  
Secretary

SEAL

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In the Matter of

RAMBUS INC.,

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Docket No. 9302

RESPONSE OF RAMBUS INC.  
TO BRIEF OF *AMICI CURIAE* MICRON TECHNOLOGY, INC.,  
SAMSUNG ELECTRONICS CORPORATION, LTD., AND HYNIX  
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MUNGER, TOLLES & OLSON LLP  
355 South Grand Avenue, 35th Floor  
Los Angeles, California 90071  
(213) 683-9100

WILMER CUTLER PICKERING  
HALE AND DORR LLP  
1875 Pennsylvania Avenue, NW  
Washington, D.C. 20006  
(202) 663-6000

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