

marketplace vis a vis its direct competitors, other DRAM manufacturers. Because of the relative stability of certain components of this cost and price information, the information will remain of critical competitive importance for at least ten years.

4. More particularly:

a) Exhibit A (beginning bates nos. HR905_089448), entitled *DR-DRAM Cost Premium (Vs. SDRAM)*, dated January, 12, 1999, was created by the Company's internal marketing department for an internal cost/benefit analysis of RDRAM and SDRAM production. Its distribution was limited to those persons with a "need to know" within Hynix. It sets forth with specificity the Company's price and cost premium projections for RDRAM, the Company's particularized manufacturing costs and production yields. All of the foregoing are current trade secrets and access to this information remains restricted within the Company to a "need to know basis." Furthermore, the Company's numbers and calculations contained in Exhibit A are viable today, are currently relied upon and will be relied upon in the future by the Company in conducting its business.

b) Exhibit B (beginning bates nos. HR905_089398), entitled *Hyundai DRDRAM Project Proposal*, dated August 3, 1999, was created by the Strategic Marketing Team in the DRAM Business Unit for an internal analysis. Its distribution was limited to those persons with a "need to know" within Hynix. It contains a cost and efficiency comparison between two divisions of the Company, that includes specific yield, cost of manufacturing and cost of production numbers. All of the foregoing are current trade secrets and access to this information remains restricted within the Company to a "need to know basis." Furthermore, the Company's numbers and calculations contained in Exhibit B are viable today, are currently relied upon and will be relied upon in the future by the Company in conducting its business.

c) Exhibit C (beginning bates nos. HR905_089388), entitled *Direct RDRAM Business Updates*, dated August 16, 1999, was created by the Company's internal marketing department for internal analysis. Its distribution was limited to those persons with a "need to know" within Hynix. It contains RDRAM component and module price information developed internally by the Company. All of the foregoing information is a current trade secret and access to this information remains restricted within the company to a "need to know basis." Furthermore, the Company's numbers and calculations contained in Exhibit C are viable today, are currently relied upon and will be relied upon in the future by the Company in conducting its business.

d) Exhibit D (beginning bates nos. HR905_089368), entitled *Rambus Meeting*, dated May 12, 2000, was created by the Company's internal marketing department for internal analysis. Its distribution was limited to those persons with a "need to know" within Hynix. Many of these pages retain their original Korean language text; these pages generally discuss product demand and supply; the Company's plans for responding to same; and most specifically, price and cost analyses, including the Company's internal calculations. All of the foregoing information are trade secrets and access to this information remains restricted within the Company to a "need to know basis." Furthermore, the Company's numbers and calculations contained in Exhibit D are viable today, are currently relied upon and will be relied upon in the future by the Company in conducting its business.

e) Exhibit E (beginning bates nos. HR905_089274), entitled *Marketing/Engineering Meeting*, dated March 19, 2001, was created by the DRAM Business Unit for a restricted meeting between select representatives of the Company and Rambus. Its distribution was limited to the attendees of that meeting. Exhibit E contains product specific cost

and yield analyses developed by the Company. All of the foregoing are current trade secrets and access to this information remains restricted within the Company to a “need to know basis.”

Furthermore, the Company’s numbers and calculations contained in Exhibit E are viable today, are currently relied upon and will be relied upon in the future by the Company in conducting its business.

f) Exhibit F (beginning bates nos. HR905_089271), entitled *Rambus Review (2001)* dated March 21, 2001, was created by the DRAM Business Unit for an internal analysis. Its distribution was limited to those persons with a “need to know” within Hynix. Many of these pages retain their original Korean language text; these pages generally discuss production plans and more specifically set forth wafer revenue on a per unit basis and profit and loss by cost analysis. All of the foregoing information is a current trade secret and access to this information remains restricted within the Company to a “need to know basis”. Furthermore, the Company’s numbers and calculations contained in Exhibit F are viable today, are currently relied upon and will be relied upon in the future by the Company in conducting its business.

5. All of the information contained in Exhibits A-F was developed exclusively by Hynix from Hynix confidential financial and production information solely for its internal use and distribution. The only exception to the foregoing is Exhibit E, which was distributed to a limited number of Rambus meeting attendees. Under no circumstances have any of the confidential trade secrets in Exhibits A-F been disclosed to any other DRAM manufacturers, the Company’s direct competitors. Furthermore, it would not be possible for our competitors to determine this information from any source other than the Company.

6. All of the information contained Exhibits A-F is based upon internal calculations and formulations of price, cost and yield information. If this information were disclosed to a

competitor, that competitor would be able to exact immediate harm to the Company in the marketplace because it would know precisely the strengths and weaknesses of Hynix's internal marketing strategy. It could adjust its own strategy to exploit any vulnerabilities in, for example, Hynix's production capacities or overhead expenses.

7. I am informed and believe that the information contained in Exhibits A-F has never been distributed or otherwise made known outside of the Company, except for the meeting identified above and pursuant to the terms and conditions of the protective order in place in the Rambus litigation.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this _____ day of April, 2003, in

_____.

D.S. CHUNG

SV #130229

TABS A – F
REDACTED