

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

COMMISSIONERS: Deborah Platt Majoras, Chairman
Orson Swindle
Thomas B. Leary
Pamela Jones Harbour
Jon Lebowitz

In the Matter of

RAMBUS INC.,

a corporation.

Docket No. 9302

**UNOPPOSED MOTION BY RESPONDENT RAMBUS INC.
FOR RELEASE OF CERTAIN TESTIMONY CITED IN
INITIAL DECISION INTO THE PUBLIC RECORD**

Pursuant to 16 C.F.R. § 3.45, certain documents produced by third parties during discovery in this action were afforded *in camera* treatment by Chief Judge McGuire. At trial, testimony by certain witnesses was afforded *in camera* treatment when the exhibits in question were referenced. Some of that testimony was quoted by Judge McGuire in his Initial Decision in this matter, including a statement by an employee of Intel Corporation named Peter MacWilliams. *See* Initial Decision, ¶ 557.

Intel Corporation has agreed that the MacWilliams testimony quoted in paragraph 557 of the Initial Decision need not be afforded *in camera* treatment and may be released into the public record. *See* Stipulation By Non-Party Intel Corporation Authorizing Release of Certain Testimony Cited in Initial Decision into the Public Record, filed herewith. The testimony in question is attached to said Stipulation as exhibit A. The *in camera* status of other testimony by Mr. MacWilliams or of any documents afforded *in camera* treatment by Judge McGuire shall not be affected by this motion.

Complaint Counsel have stated that they do not oppose the relief sought by this motion.

DATED: March __, 2005

Respectfully submitted,

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

In the Matter of

RAMBUS INC.,

a corporation.

Docket No. 9302

**(PROPOSED) ORDER RELEASING
CERTAIN TESTIMONY CITED IN INITIAL DECISION
INTO THE PUBLIC RECORD**

For good cause shown, it is hereby ORDERED that the entirety of paragraph 557 of the Initial Decision in this case, containing testimony by a trial witness named Peter MacWilliams, shall be and hereby is released into the public record.

By the Commission.

Donald S. Clark
Secretary

Issued: _____

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION

In the Matter of)
)
)
RAMBUS INCORPORATED,)
)
a corporation.)
_____)

Docket No. 9302

CERTIFICATE OF SERVICE

I, Kenneth A. Bamberger, hereby certify that on March 21, 2005, I caused true and correct copies of the *Unopposed Motion by Respondent Rambus Inc. For Release of Certain Testimony Cited in Initial Decision into the Public Record*, and a *(Proposed) Order Releasing Certain Testimony Cited in Initial Decision into the Public Record*, to be served on the following persons by hand delivery:

Hon. Stephen J. McGuire
Chief Administrative Law Judge
Federal Trade Commission
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Washington, D.C. 20580

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Kenneth A. Bamberger

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION

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

CERTIFICATION

I, Kenneth A. Bamberger, hereby certify that the electronic copies of the *Unopposed Motion by Respondent Rambus Inc. For Release of Certain Testimony Cited in Initial Decision into the Public Record*, and a *(Proposed) Order Releasing Certain Testimony Cited in Initial Decision into the Public Record*, accompanying this certification are true and correct copies of the paper versions that are being filed with the Secretary of the Commission on March 21, 2005 by other means.

Kenneth A. Bamberger
March 21, 2005