

**PUBLIC**

UNITED STATES OF AMERICA  
BEFORE THE FEDERAL TRADE COMMISSION



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In the matter of )  
 )  
RAMBUS INC., )  
 )  
A corporation. )  
\_\_\_\_\_

Docket No. 9302

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

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Pursuant to 16 C.F.R. § 3.52(j), Micron Technology, Inc., Samsung Electronics Corporation, Ltd., and Hynix Semiconductor, Inc. (“Amici”) respectfully move for leave to file a brief as amici curiae in the above-captioned matter.

Amici Curiae Micron Technology, Inc. (“Micron”), Samsung Electronics Corporation, Ltd. (“Samsung”), and Hynix Semiconductor, Inc. (“Hynix”) (collectively “Amici”) are leading global semiconductor companies that design, manufacture, and sell dynamic random access memory (“DRAM”), including single data rate synchronous DRAMs (“SDR” or SDR SDRAMs”) and double data rate synchronous DRAMs (“DDR” or “DDR SDRAMs”). Amici contribute billions of dollars in annual sales to the U.S. and world economy, invest hundreds of millions of dollars in research and development, hold thousands of United States patents, employ thousands of people both in the United States and overseas, and are members of a variety of standard-setting organizations (“SSOs”), including the JEDEC Solid State Technology Association (“JEDEC”). They are among the many firms victimized by Rambus’s unlawful conduct.

On August 2, 2006, the Commission unanimously found that Rambus had “exploited its participation in JEDEC to obtain patents that would cover technologies incorporated into now-ubiquitous JEDEC memory standards, without revealing its patent position to other JEDEC members. As a result, Rambus was able to distort the standard-setting process and engage in an anticompetitive ‘hold up’ of the computer memory industry.” (Opinion of the Commission, August 2, 2006, at 3). Rambus’s deceptive course of conduct gave it unlawful monopoly power in violation of Section 2 of the Sherman Act and Section 5 of the FTC Act. (*Id.*)

On February 5, 2007, the Commission issued its Opinion of the Commission on Remedy (hereinafter “Remedy Opinion”) and accompanying Final Order on the appropriate remedy for

