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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN FRANCISCO

RAMBUS INC.,
Plaintiff,
v.
MICRON TECHNOLOGY, INC., et al.,
Defendants.

CASE NO. CGC 04-431105
VERDICT FORM
Department: 611
Judge: Hon. James J. McBride

1 We answer the questions submitted to us as follows:

2

3 Rambus's Claim for Violation of Cartwright Act

4 1. Did Micron and/or Hynix agree with each other and/or Infineon and/or Samsung to fix
5 RDRAM prices high and DDR prices low and/or restrict RDRAM output in order to prevent
6 RDRAM from becoming the standard for computer memory?

7 YES _____ NO

8 *If you answered "YES" to this question, continue to question 2.*

9 *If you answered "NO" to this question, go to question 16; do not answer questions 2-15.*

10

11 2. Which of those companies agreed to fix RDRAM prices high and DDR prices low and/or
12 restrict RDRAM output in order to prevent RDRAM from becoming the standard for computer
13 memory?

14 Micron _____

15 Hynix _____

16 Infineon _____

17 Samsung _____

18 *Continue to question 3.*

19 For purposes of the following questions regarding Rambus's claim for a violation of the
20 Cartwright Act (questions 3-15), "those companies" refers to the companies identified in your
21 answer to question 2.

22

23 3. Were acts of those companies in furtherance of the agreement identified in question 1
24 a substantial factor in preventing RDRAM from becoming the standard for computer memory?

25 YES _____ NO _____

26 *If you answered "YES" to this question, continue to question 4.*

27 *If you answered "NO" to this question, go to question 16; do not answer questions 4-15.*

28

1 4. Was the purpose or effect of the agreed-upon conduct of those companies to restrain
2 competition?

3 YES _____ NO _____

4 *If you answered "YES" to this question, continue to question 5.*

5 *If you answered "NO" to this question, go to question 16; do not answer questions 5-15.*

6

7 5. Has Rambus proved that the relevant product market is DRAM interface technology?

8 YES _____ NO _____

9 *If you answered "YES" to this question, go to question 8; do not answer questions 6-7.*

10 *If you answered "NO" to this question, continue to question 6.*

11

12 6. Has Rambus proved a relevant product market?

13 YES _____ NO _____

14 *If you answered "YES" to this question, continue to question 7.*

15 *If you answered "NO" to this question, go to question 16; do not answer questions 7-15.*

16

17 7. What is the relevant product market?

18 _____

19 *Continue to question 8.*

20

21 8. Has Rambus proved that the relevant geographic market is worldwide?

22 YES _____ NO _____

23 *If you answered "YES" to this question, go to question 11; do not answer questions 9-10.*

24 *If you answered "NO" to this question, continue to question 9.*

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1 9. Has Rambus proved a relevant geographic market?

2 YES _____ NO _____

3 *If you answered "YES" to this question, continue to question 10.*

4 *If you answered "NO" to this question, go to question 16; do not answer questions 10-15.*

6 10. What is the relevant geographic market?

7 _____

8 *Continue to question 11.*

10 11. Did the anticompetitive effect of the restraint outweigh any beneficial effect on
11 competition?

12 YES _____ NO _____

13 *If you answered "YES" to this question, continue to question 12.*

14 *If you answered "NO" to this question, go to question 16; do not answer questions 12-15.*

16 12. For what year(s) would RDRAM have become the standard for computer memory in the
17 absence of the conduct identified in question 1?

18 _____

19 *Continue to question 13.*

21 13. Was anticompetitive conduct of those companies a substantial factor in preventing
22 RDRAM from becoming the standard for any of the following industry segments?

23 Performance Desktops YES _____ NO _____

24 Mainstream Desktops YES _____ NO _____

25 Value Desktops YES _____ NO _____

26 Notebooks/Laptops YES _____ NO _____

27 Servers YES _____ NO _____

28 Workstations YES _____ NO _____

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- Upgrade Modules YES _____ NO _____
- Gaming/Graphics YES _____ NO _____
- Digital TV/DVD/DVR/Set-Top-Box YES _____ NO _____
- Mobile Phones YES _____ NO _____
- Industrial Electronics/Data Processing YES _____ NO _____
- Other Consumer/Business YES _____ NO _____

Continue to question 14.

14. Was anticompetitive conduct committed by those companies after May 4, 2000 a substantial factor in causing RDRAM's failure to become the standard for computer memory?

YES _____ NO _____

If you answered "YES" to this question, continue to question 15.

If you answered "NO" to this question, go to question 16; do not answer question 15.

15. What damages, if any, did Rambus incur from anticompetitive conduct of those companies occurring after May 4, 2000?

\$ _____

Continue to question 16.

1 Rambus's Claim for Conspiracy To Intentionally Interfere with Prospective Economic Relations

2 16. Did Micron and/or Hynix conspire with each other and/or Infineon and/or Samsung to
3 disrupt an economic relationship between Rambus and Intel?

4 YES _____ NO

5 *If you answered "YES" to this question, continue to question 17.*

6 *If you answered "NO" to this question, stop and have the presiding juror sign at the*
7 *bottom of this verdict form; do not answer questions 17-31.*

8
9 17. Which of those companies agreed to disrupt that relationship?

10 Micron _____

11 Hynix _____

12 Infineon _____

13 Samsung _____

14 *Continue to question 18.*

15 For purposes of the following questions regarding Rambus's claim for conspiracy to
16 intentionally interfere with prospective economic relations (questions 18-27), "those companies"
17 refers to the companies identified in your answer to question 17.

18
19 18. Did those companies disrupt that relationship by engaging in wrongful conduct through a
20 violation of the Cartwright Act?

21 YES _____ NO _____

22 *If you answered "YES" to this question, continue to question 19.*

23 *If you answered "NO" to this question, stop and have the presiding juror sign at the*
24 *bottom of this verdict form; do not answer questions 19-31.*

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1 19. Did those companies know of that relationship?

2 YES _____ NO _____

3 *If you answered "YES" to this question, continue to question 20.*

4 *If you answered "NO" to this question, stop and have the presiding juror sign at the*
5 *bottom of this verdict form; do not answer questions 20-31.*

6
7 20. Did those companies intend to disrupt that relationship?

8 YES _____ NO _____

9 *If you answered "YES" to this question, continue to question 21.*

10 *If you answered "NO" to this question, stop and have the presiding juror sign at the*
11 *bottom of this verdict form; do not answer questions 21-31.*

12
13 21. Would that relationship probably have resulted in an economic benefit to Rambus?

14 YES _____ NO _____

15 *If you answered "YES" to this question, continue to question 22.*

16 *If you answered "NO" to this question, stop and have the presiding juror sign at the*
17 *bottom of this verdict form; do not answer questions 22-31.*

18
19 22. Was the wrongful conduct of those companies a substantial factor in preventing RDRAM
20 from becoming the standard for computer memory?

21 YES _____ NO _____

22 *If you answered "YES" to this question, continue to question 23.*

23 *If you answered "NO" to this question, stop and have the presiding juror sign at the*
24 *bottom of this verdict form; do not answer questions 23-31.*

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1 23. For what year(s) would RDRAM have become the standard for computer memory in the
2 absence of the conduct identified in question 18?

3 _____

4 *Continue to question 24.*

5
6 24. Was the wrongful conduct of those companies a substantial factor in preventing RDRAM
7 from becoming the standard for any of the following industry segments?

8 Performance Desktops YES _____ NO _____

9 Mainstream Desktops YES _____ NO _____

10 Value Desktops YES _____ NO _____

11 Notebooks/Laptops YES _____ NO _____

12 Servers YES _____ NO _____

13 Workstations YES _____ NO _____

14 Upgrade Modules YES _____ NO _____

15 Gaming/Graphics YES _____ NO _____

16 Digital TV/DVD/DVR/Set-Top-Box YES _____ NO _____

17 Mobile Phones YES _____ NO _____

18 Industrial Electronics/Data Processing YES _____ NO _____

19 Other Consumer/Business YES _____ NO _____

20 *Continue to question 25.*

21
22 25. Was the primary objective of the conspiracy to prevent RDRAM from becoming the
23 standard for computer memory complete before May 5, 2002?

24 YES _____ NO _____

25 *If you answered "YES" to this question, stop and have the presiding juror sign at the*
26 *bottom of this verdict form; do not answer questions 26-31.*

27 *If you answered "NO" to this question, continue to question 26.*

28

1 26. Did those companies commit one or more overt acts in furtherance of the conspiracy on or
2 after May 5, 2002?

3 YES _____ NO _____

4 *If you answered "YES" to this question, continue to question 27.*

5 *If you answered "NO" to this question, stop and have the presiding juror sign at the*
6 *bottom of this verdict form; do not answer questions 27-31.*

7
8 27. What damages, if any, did Rambus incur from wrongful conduct of those companies?

9 \$ _____

10 *Continue to question 28.*

11
12 28. *Answer this question only if you included Micron in your answer to question 17. If you*
13 *did not include Micron in your answer to question 17, go to question 30; skip this question and*
14 *question 29.*

15 Did one or more officers, directors, or managing agents of Micron acting on behalf of
16 Micron disrupt the economic relationship between Rambus and Intel with malice, oppression, or
17 fraud?

18 YES _____ NO _____

19 *If you answered "YES" to this question, continue to question 29.*

20 *If you answered "NO" to this question, go to question 30; do not answer question 29.*

21
22 29. What amount of punitive damages, if any, do you award against Micron?

23 \$ _____

24 *Continue to question 30.*

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1 30. Answer this question only if you include Hynix in your answer to question 17. If you did
2 not include Hynix in your answer to question 17, stop and have the presiding juror sign at the
3 bottom of this verdict form; skip this question and question 31.

4 Did one or more officers, directors, or managing agents of Hynix acting on behalf of Hynix
5 disrupt the economic relationship between Rambus and Intel with malice, oppression, or fraud?

6 YES _____ NO _____

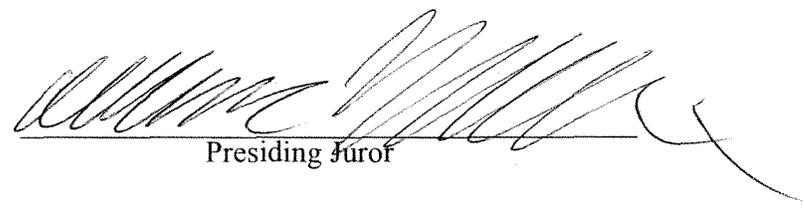
7 If you answered "YES" to this question, continue to question 31.

8 If you answered "NO" to this question, stop and have the presiding juror sign at the bottom
9 of this verdict form; do not answer question 31.

10
11 31. What amount of punitive damages, if any, do you award against Hynix?

12 \$ _____

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16 Signed:


Presiding Juror

17
18 Dated:

11/16/2011

19 After this verdict form has been signed, notify the clerk that you are ready to present your verdict
20 in the courtroom.

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