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13 Attorneys for Plaintiff
RAMBUS INC.

14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA - SAN JOSE DIVISION

16
17 HYNIX SEMICONDUCTOR INC., et al.

CASE NO. C 00-20905 RMW

18 Plaintiffs,

DECLARATION OF CAROLYN HOECKER
LUEDTKE IN SUPPORT OF RAMBUS'S
MOTION IN LIMINE TO EXCLUDE
CERTAIN TESTIMONY OF RICHARD J.
GILBERT

19 vs.

20 RAMBUS INC.,

21 Defendant.

Date: November 21, 2007
Time: 2:00 pm
Place: Department 6, 4th Floor
Judge: Hon. Ronald M. Whyte

22
23 RAMBUS INC.,

CASE NO.: C 05-00334 RMW

24 Plaintiff,

[PUBLIC VERSION]

25 v.

26 HYNIX SEMICONDUCTOR INC., et al.,

27 Defendants
28

1 I, Carolyn Hoecker Luedtke, hereby declare:

2 1. I am an attorney with the law firm Munger, Tolles & Olson LLP, counsel of record
3 for Plaintiff and Counterclaim Defendant Rambus Inc. ("Rambus") in the above-entitled action. I
4 am licensed in the State of California and admitted to practice before this Court. I make this
5 declaration based on my personal knowledge and, if called upon as a witness, I could and would
6 testify competently as to the matters set forth below.

7 2. Rambus is filing concurrently herewith its *Daubert* Motion No. 1 to Exclude
8 Certain Testimony of Richard J. Gilbert.

9 3. A true and correct copy of the Expert Report of Richard J. Gilbert, dated August 1,
10 2007, is attached as Exhibit A.

11 4. A true and correct copy of 1995 Department of Justice and Federal Trade
12 Commission Antitrust Guidelines for the Licensing of Intellectual Property, section 3.2.1, is
13 attached as Exhibit B.

14 5. A true and correct copy of the Federal Trade Commission's 1992 Horizontal
15 Merger Guidelines is attached as Exhibit C. These guidelines are available on the Internet at
16 <http://www.ftc.gov/bc/docs/horizmer.htm>.

17 6. A true and correct copy of excerpts from the deposition of Richard J. Gilbert,
18 taken Monday, September 24, 2007, is attached as Exhibit D.

19 7. A true and correct copy of the Expert Witness Report of Laurence H. Pretty is
20 attached as Exhibit E.

21 8. A true and correct copy of an April 6, 1992 e-mail from Allen Roberts of Rambus
22 to Geoff Tate of Rambus, numbered R1299606, and branded "Outside Counsel Only - Pursuant to
23 the December 1, 2005 Piercing Order Docket No. 05-00334 RMW" is attached as Exhibit F.

24 9. A true and correct copy of the Expert Witness Report of Richard J. Gilbert, dated
25 September, 11, 2007 is attached as Exhibit G.

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I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct.

Executed on October 17, 2007 at San Francisco, California.

/s/ Carolyn Hoecker Luedtke
Carolyn Hoecker Luedtke