

1 Barbara Clarke McCurdy (Admitted *Pro Hac Vice*)  
 barbara.mccurdy@finnegan.com  
 2 Naveen Modi (Admitted *Pro Hac Vice*)  
 naveen.modi@finnegan.com  
 3 Srikala P. Atluri (Admitted *Pro Hac Vice*)  
 srikala.atluri@finnegan.com  
 4 FINNEGAN, HENDERSON, FARABOW,  
 GARRETT & DUNNER, L.L.P.  
 5 901 New York Avenue, N.W.  
 Washington, D.C. 20001  
 6 Telephone: (202) 408-4000  
 Facsimile: (202) 408-4400  
 7

8 Tina E. Hulse (CA Bar No. 232936)  
 tina.hulse@finnegan.com  
 FINNEGAN, HENDERSON, FARABOW,  
 9 GARRETT & DUNNER, L.L.P.  
 3300 Hillview Avenue  
 10 Palo Alto, California 94304-1203  
 Telephone: (650) 849-6600  
 11 Facsimile: (650) 849-6666

12 Attorneys for Plaintiff  
 Rambus Inc.

14 UNITED STATES DISTRICT COURT  
 15 NORTHERN DISTRICT OF CALIFORNIA  
 16 SAN FRANCISCO DIVISION

17 RAMBUS INC.,  
 18 Plaintiff,  
 19 v.  
 20 INTERNATIONAL BUSINESS MACHINES  
 CORPORATION,  
 21 Defendant.

CASE NO. C 10-03736 JSW  
 (Related Case: C 10-04017 JSW)

**STIPULATION RE: FILING OF  
 PLAINTIFF RAMBUS INC.'S FIRST  
 AMENDED COMPLAINT;**

**~~PROPOSED~~ ORDER**

23  
 24  
 25  
 26  
 27  
 28

1 The parties, through their respective counsel, hereby stipulate that, subject to the approval of  
2 the Court, Plaintiff Rambus Inc. (“Rambus”) be granted leave to file its First Amended Complaint, a  
3 copy of which is attached hereto as Exhibit 1. Rambus’s First Amended Complaint shall be filed  
4 within three court days after the Court enters this Order.

5 By her signature below, counsel for Plaintiff attests that counsel for Defendant concurs in the  
6 filing of this stipulation.

7 Respectfully submitted,

8 Date: March 10, 2011

FINNEGAN, HENDERSON, FARABOW,  
GARRETT & DUNNER, L.L.P.

9  
10 By: /s/ Tina E. Hulse  
11 Tina E. Hulse (CA Bar No. 232936)  
12 tina.hulse@finnegan.com  
13 FINNEGAN, HENDERSON, FARABOW,  
14 GARRETT & DUNNER, L.L.P.  
3300 Hillview Avenue  
Palo Alto, California 94304-1203  
Telephone: (650) 849-6600  
Facsimile: (650) 849-6666

15 Barbara Clarke McCurdy (Admitted *Pro Hac Vice*)  
16 barbara.mccurdy@finnegan.com  
17 Naveen Modi (Admitted *Pro Hac Vice*)  
18 naveen.modi@finnegan.com  
19 Srikala P. Atluri (Admitted *Pro Hac Vice*)  
20 srikala.atluri@finnegan.com  
21 FINNEGAN, HENDERSON, FARABOW,  
22 GARRETT & DUNNER, L.L.P.  
901 New York Avenue, N.W.  
Washington, D.C. 20001  
Telephone: (202) 408-4000  
Facsimile: (202) 408-4400

Attorneys for Plaintiff,  
Rambus Inc.

23 Dated: March 10, 2011

24 By: /s/ Edward A. Kmett  
25 Edward A. Kmett (SBN: 204374)  
26 FITZPATRICK, CELLA, HARPER & SCINTO  
27 650 Town Center Drive, Suite 1600  
Costa Mesa, CA 92626  
Telephone: (714) 540-8700  
Facsimile: (714) 540-9823

28 Attorney for Defendant,  
International Business Machines Corporation

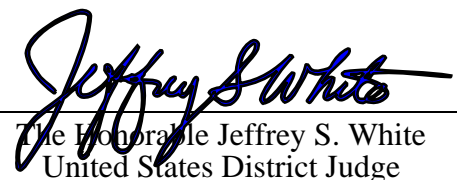
1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**[PROPOSED] ORDER**

Pursuant to the foregoing Stipulation, and good cause appearing therefore;

**IT IS SO ORDERED.**

Dated: March 11, 2011



---

The Honorable Jeffrey S. White  
United States District Judge  
Northern District of California