

1 Parties Listed On Signature Page

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E-Filed: 10/6/2008

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

RAMBUS INC.,  
Plaintiff,  
vs.  
HYNIX SEMICONDUCTOR INC., et al.,  
Defendant.

CASE NO.: C 05-00334 RMW  
**STIPULATION AND [REDACTED]  
ORDER TO SHORTEN THE BRIEFING  
SCHEDULE FOR RAMBUS'S  
EMERGENCY MOTION TO STRIKE [L.R.  
6-2]**  
Judge: Hon. Ronald M. Whyte  
Courtroom: 6

RAMBUS INC.,  
Plaintiff,  
vs.  
SAMSUNG ELECTRONICS CO., LTD.,  
et al.,  
Defendant.

CASE NO.: C 05-02298 RMW

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

CASE NO. C-06-00244 RMW

~~CHAMBERS COPY~~

1           WHEREAS, the parties exchanged rebuttal expert reports on September 26, 2008;  
2           WHEREAS, the Manufacturers served separate rebuttal expert reports on  
3 noninfringement;

4           WHEREAS, following the Manufacturers' service of their individual rebuttal  
5 reports, Rambus objected to the Manufacturers' submission of four separate rebuttal reports on  
6 noninfringement as impermissible under the Joint Case Management Order;

7           WHEREAS, the Manufacturers contend that they are entitled to submit their own  
8 individual rebuttal expert reports on noninfringement under the Joint Case Management Order;

9           WHEREAS, on September 30, 2008, the parties met and conferred in good faith  
10 regarding Rambus's objections but were unable to resolve their differences, and Rambus  
11 indicated its intent to bring an emergency motion to strike three of the Manufacturers' four expert  
12 reports on noninfringement;

13           WHEREAS, the parties have agreed that the discovery cutoff for expert  
14 depositions of the Manufacturers' noninfringement expert or experts shall be enlarged such that  
15 their deposition or depositions can proceed after the Court resolves Rambus's motion to strike;

16           WHEREAS, the parties agree that this will not impact the schedule for filing and  
17 resolution of *Daubert* or dispositive motions, or the trial date;

18           WHEREAS, in order to expedite the resolution of Rambus's objections, the parties  
19 have agreed to the briefing and hearing schedule set forth below, subject to the Court's approval  
20 and availability:

21           NOW, THEREFORE, IT IS ORDERED THAT  
22           Rambus shall file its Emergency Motion to Strike on or before October 3, 2008;  
23           The Manufacturers will file their opposition(s) on or before October 10, 2008;  
24           Rambus will file its reply on or before October 14, 2008;  
25           The hearing on Rambus's Emergency Motion to Strike shall be on October 17,  
26 2008;

27           The discovery cutoff for expert depositions of the Manufacturers' noninfringement  
28 expert or experts shall be enlarged such that their deposition or depositions can proceed after the

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Court resolves Rambus's motion to strike.

SO ORDERED

DATED: 10/4/08 Ronald M. Whyte

The Honorable Ronald M. Whyte  
District Judge

1 DATED: October 2, 2008

MUNGER, TOLLES & OLSON LLP

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SIDLEY AUSTIN LLP

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McKOOL SMITH P.C.

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By:           /s/ Jennifer L. Polse            
JENNIFER L. POLSE

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Attorneys for RAMBUS INC.

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7 DATED: October 2, 2008

JULIE HAN  
TOWNSEND and TOWNSEND and CREW,  
LLP

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By           /s/ Julie Han            
JULIE HAN

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Attorneys for HYNIX SEMICONDUCTOR  
INC., HYNIX SEMICONDUCTOR  
AMERICA INC., HYNIX  
SEMICONDUCTOR MANUFACTURING  
AMERICA INC., HYNIX  
SEMICONDUCTOR U.K. LTD., and HYNIX  
SEMICONDUCTOR DEUTSCHLAND  
GmbH

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16 DATED: October 2, 2008

SVEN RAZ  
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By:           /s/ Sven Raz            
SVEN RAZ

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Attorneys for MICRON TECHNOLOGY  
INC., et. al.

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22 DATED: October 2, 2008

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WEIL, GOTSHAL & MANGES LLP

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By:           /s/ Robert Berezin            
ROBERT BEREZIN

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Attorneys for SAMSUNG ELECTRONICS  
CO., LTD., SAMSUNG ELECTRONICS  
AMERICA, INC., SAMSUNG  
SEMICONDUCTOR, INC., AND SAMSUNG  
AUSTIN SEMICONDUCTOR, L.P.

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1 DATED: October 2, 2008

VICKIE FEEMAN  
ORRICK HERRINGTON & SUTCLIFFE  
LLP

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3  
4 By:           /s/ Vickie Feeman            
VICKIE FEEMAN

5 Attorneys for NANYA TECHNOLOGY  
6 CORPORATION and NANYA  
7 TECHNOLOGY CORPORATION USA

8 Filer's Attestation:

9 I, Jennifer L. Polse, am the ECF user whose identification and password are being used to  
10 file this **STIPULATION AND [PROPOSED] ORDER TO EXTEND THE DEADLINES** || HP  
11 **FOR THE MCALEXANDER DEPOSITION AND ANY RELATED DAUBERT**  
12 **BRIEFING**. In compliance with General Order 45.X.B, I hereby attest that Julie Han, Sven Raz,  
13 Robert Berezin and Vickie Feeman concur in this filing.

14 By:           /s/ Jennifer L. Polse            
15 Jennifer L. Polse