

1 (Parties and counsel listed on signature page)

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E-filed: November 14, 2008

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UNITED STATES DISTRICT COURT

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NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

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RAMBUS INC.,

CASE NO.: C 05-00334 RMW

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Plaintiff,

STIPULATION AND ~~PROPOSED~~ ORDER

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vs.

RE PAGE LIMIT FOR RAMBUS'S

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HYNIX SEMICONDUCTOR INC., et al.,

CONSOLIDATED OPPOSITION TO

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Defendants.

MANUFACTURERS' DAMAGES-

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RELATED DAUBERT AND SUMMARY

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JUDGMENT MOTIONS

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RAMBUS INC.,

CASE NO.: C 05-02298 RMW

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Plaintiff,

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vs.

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SAMSUNG ELECTRONICS CO., LTD.,

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et al.,

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Defendants.

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

CASE NO.: C 06-00244 RMW

1 WHEREAS, the following *Daubert* and summary judgment motions, among
2 others, were filed on October 24 and October 27, 2008:

3 (1) Hynix’s *Daubert* Motion to Exclude Portions of Expert Report and
4 Testimony of Rambus’s Damages Expert David J. Teece (*Daubert* No. 6);

5 (2) Micron’s and Samsung’s *Daubert* Motion to Preclude David J. Teece From
6 Offering Testimony Regarding an “Infringer’s Royalty,” Royalty Rate Surveys and Two
7 Unquantified “Adjustments” That Allegedly “Offset One Another” (*Daubert* No. 8);

8 (3) Micron’s and Samsung’s Joint *Daubert* Motion and Motions in Limine
9 Regarding Certain Damages Issues (*Daubert* No. 9);

10 (4) Nanya Technology Corporation’s and Nanya Technology Corporation
11 USA’s *Daubert* Motion to Exclude Certain Testimony of Dr. Teece re: Hypothetical Negotiation
12 Date (*Daubert* No. 10);

13 (5) Nanya Technology Corporation’s and Nanya Technology Corporation
14 USA’s Motion re Royalty Base Issues (*Daubert* No. 11);

15 (6) Micron’s and Samsung’s Motion for Summary Judgment Regarding
16 Certain Damages Issues and Related *Daubert* Motions to Preclude David J. Teece From Offering
17 Testimony on Such Issues (*MSJ* No. 8);

18 (7) Nanya Technology Corporation’s Motion for Partial Summary Judgment of
19 Non-Infringement (Limitation of Damages/Non-U.S. Sales) (*MSJ* No. 9);

20 (8) Nanya Technology Corporation USA’s Motion for Partial Summary
21 Judgment of Non-Infringement (Limitation of Damages/Non-U.S. Sales) (*MSJ* No. 10); and

22 (9) Hynix’s Motion for Summary Judgment For the Prevention of Double
23 Recovery of Damages Relating to Hynix’s Sales of DDR2, DDR3, gDDR2, and GDDR3
24 Products (*MSJ* No. 11); and

25 WHEREAS, Rambus intends to file a single consolidated opposition to the above-
26 listed motions (including any joinders to such motions);

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ORDER

Pursuant to stipulation, it is so ordered.

Dated: November 13, 2008

Ronald M. Whyte

The Honorable Ronald M. Whyte
United States District Judge

1 ATTESTATION

2 **Filer's Attestation:** Pursuant to General Order No. 45, §X(B), I attest under penalty of
3 perjury that concurrence in the filing of this e-filed document has been obtained from counsel for
4 the Manufacturers.

5 Dated: November 12, 2008

6 By: _____/s/_____
ROLLIN A. RANSOM

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