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14 UNITED STATES DISTRICT COURT

15 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

16 RAMBUS INC.,

17 Plaintiff,

18 vs.

19 HYNIX SEMICONDUCTOR INC., et al.,

20 Defendant.

CASE NO. 05-00334 RMW

**RAMBUS INC.'S MOTION FOR
 ADMINISTRATIVE RELIEF TO FILE
 DOCUMENTS UNDER SEAL (LOCAL
 RULES 79-5 AND 7-11) IN CONNECTION
 WITH RAMBUS'S CONSOLIDATED
 OPPOSITION TO MANUFACTURERS'
 MOTIONS FOR SUMMARY JUDGMENT
 ON WILLFUL INFRINGEMENT**

Judge: Hon. Ronald M. Whyte
 Trial Date: Jan. 19, 2009
 Date: Dec. 11, 2008
 Dept: Courtroom 6, 4th Floor

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RAMBUS INC.,
Plaintiff,
v.
SAMSUNG ELECTRONICS CO., LTD.,
et al.,
Defendants.

CASE NO. C 05-02298 RMW

RAMBUS INC.,
Plaintiff,
vs.
MICRON TECHNOLOGY INC. and
MICRON SEMICONDUCTOR
PRODUCTS, INC.,
Defendants.

CASE NO: C-06-00244 RMW

1 Pursuant to Local Rules 79.5 and 7-11, Rambus Inc. (“Rambus”) respectfully requests that
2 the Court permit the filing under seal of the following documents lodged with the Court in
3 connection with Rambus’s Consolidated Opposition to Manufacturers’ Motions for Summary
4 Judgment on Willful Infringement:

5 **1. Rambus Inc.’s Consolidated Opposition to Manufacturers’ Motions for**
6 **Summary Judgment on Willful Infringement**

7 This motion contains information that is “Confidential,” “Special
8 Confidential/Highly Confidential,” or “Confidential — Outside Counsel Only” under the
9 Protective Order. See Declaration of Jeffrey Y. Wu In Support of Motion for Administrative
10 Relief (“Wu Decl.”) ¶ 4. Pursuant to Local Rule 79.5, Rambus has e-filed a redacted version of
11 this motion.

12 **2. Exhibits A, B, C, D, E, K, O, P, U, V, and W to the Declaration of Jeffrey Y.**
13 **Wu in Support of Rambus’s Consolidated Opposition to Manufacturers’ Motions for**
14 **Summary Judgment on Willful Infringement**

15 Exhibits A, B, C, D, E, K, O, P, U, V, and W contain information that is
16 “Confidential,” “Special Confidential/Highly Confidential,” or “Confidential — Outside Counsel
17 Only” under the Protective Order. Wu Decl. ¶ 5.

18 Rambus hereby requests leave to file under seal the confidential versions of each
19 of the documents set forth above.

20
21 DATED: November 14, 2008

MUNGER, TOLLES & OLSON LLP

SIDLEY AUSTIN LLP

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24 By: /s/ Jeffrey Y. Wu
25 Jeffrey Y. Wu

26 Attorneys for Plaintiff and Counterclaim-
27 Defendant RAMBUS INC.
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