

DOCUMENTS AS TO WHICH HYNIX CLAIMS "JOINT DEFENSE PRIVILEGE"

No.	Bates Start	Bates End	Date of Document	Author	Recipient	CC.	Description	Claim
1	HRP 002214	HRP 002216	7/5/2000	Farhad Tabrizi	D.S. Chung; Y.K. Cho	S. Park; S. Choi; Seung Han Ahn; j.com@hei.co.kr, Mike Lee	E-mail re information about Hitachi/Rambus Settlement, in connection with potential litigation	AC, WP, JD
2	HRP 002217	HRP 002219	7/5/2000	Jan du Dupreez	Farhad Tabrizi; Jeff Mailloux;		E-mail re information about Hitachi/Rambus Settlement, in connection with potential litigation	AC, WP, JD
3	HRP 002220	HRP 002220	7/1/2000	JUT67815@biglobe.ne.jp	Farhad Tabrizi		E-mail concerning joint defense, in connection with potential litigation	WP, JD
4	HRP 002221	HRP 002222	6/30/2000	Jeffrey Lee	Julian Hawkins; Tae S. Jung; Jeffrey Lee; H. Inukai; Ikeda Hiroyaki; Chung W. Lam; Farhad Tabrizi; Jan du Dupreez; Jeff Mailloux		E-mail concerning joint defense, legal report from Sughrue regarding IP issues, in connection with potential litigation	WP, JD
5	HRP 002223	HRP 002224	7/2/2000	Farhad Tabrizi	Julian Hawkins; Tae S. Jung; Jeffrey Lee; H. Inukai; Ikeda Hiroyaki; Chung W. Lam; Farhad Tabrizi; Jan du Dupreez; Jeff Mailloux		E-mail concerning joint defense, legal report from Sughrue regarding IP issues, in connection with potential litigation	WP, JD
6	HRP 002225	HRP 002226	7/2/2000	Farhad Tabrizi	spark@hei.co.kr.	Seung Han Ahn	E-mail concerning joint defense, legal report from Sughrue regarding IP issues, in connection with potential litigation	WP, JD
7	HRP 002227	HRP 002229	7/2/2000	Farhad Tabrizi	Y.K. Cho	Seung Han Ahn	E-mail concerning joint defense, in connection with potential litigation	WP, JD
8	HRP 002230	HRP 002233	7/2/2000	Y.K. Cho	Farhad Tabrizi	Seung Han Ahn	E-mail concerning joint defense, in connection with potential litigation	WP, JD
9	HRP 002234	HRP 002237	7/2/2000	Farhad Tabrizi	Y.K. Cho	Seung Han Ahn	E-mail concerning joint defense, in connection with potential litigation	WP, JD
10	HRP 002238	HRP 002238	7/2/2000	Farhad Tabrizi	D.S. Chung	S. Park; S. Choi; Seung Han Ahn	E-mail concerning joint defense, in connection with potential litigation	WP, JD
11	HRP 002239	HRP 002242	7/2/2000	Y.K. Cho	Farhad Tabrizi	Seung Han Ahn	E-mail concerning joint defense, in connection with potential litigation	WP, JD
12	HRP 002243	HRP 002247	7/2/2000	Farhad Tabrizi	Y.K. Cho	Seung Han Ahn	E-mail concerning joint defense, in connection with potential litigation	WP, JD

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13	HRP 002248	HRP 002252	7/2/2000	Y.K. Cho	Farhad Tabrizi	Seung Han Ahn; H.R. Yoon	E-mail concerning joint defense, in connection with potential litigation	WP, JD
14	HRP 002253	HRP 002258	7/2/2000	Farhad Tabrizi	Y.K. Cho	Seung Han Ahn; H.R. Yoon	E-mail concerning joint defense, in connection with potential litigation	WP, JD
15	HRP 002259	HRP 002259	7/3/2000	D.S. Chung	Farhad Tabrizi	K.H. Min; James Kim; JeeKang Seo; Chanwon Choi; I.H. Chun; M.B. Chung; Dongwon Shin; Jinho; Jongholee	E-mail concerning joint defense, in connection with potential litigation	WP, JD
16	HRP 002260	HRP 002266	7/3/2000	Y.K. Cho	Farhad Tabrizi ; Seung Han Ahn	jcom@hei.co.kr.	E-mail concerning joint defense, in connection with potential litigation	WP, JD
17	HRP 002267	HRP 002267	7/3/2000	Farhad Tabrizi	D.S. Chung	K.H. Min; James Kim; JeeKang Seo; Chanwon Choi; I.H. Chun; M.B. Chung; Dongwon Shin; Jinho; Jongholee	E-mail concerning joint defense, in connection with potential litigation	WP, JD
18	HRP 002268	HRP 002268	7/3/2000	Farhad Tabrizi	Dave Westergard	Jeff Mailloux	E-mail concerning joint defense, in connection with potential litigation	WP, JD
19	HRP 002269	HRP 002269	7/3/2000	D.S. Chung	Farhad Tabrizi	K.H. Min; James Kim; JeeKang Seo; Chanwon Choi; I.H. Chun; M.B. Chung; Dongwon Shin; Jinho; Jongholee	E-mail concerning joint defense, in connection with potential litigation	WP, JD
20	HRP 002270	HRP 002270	7/3/2000	Farhad Tabrizi	D.S. Chung	K.H. Min; James Kim; JeeKang Seo; Chanwon Choi; I.H. Chun; M.B. Chung; Dongwon Shin; Jinho; Jongholee	E-mail concerning joint defense, in connection with potential litigation	WP, JD
21	HRP 002271	HRP 002271	7/5/2000	Dave Westergard	Farhad Tabrizi	Jeff Mailloux	E-mail concerning joint defense, in connection with potential litigation	WP, JD
22	HRP 002272	HRP 002272	7/5/2000	Farhad Tabrizi	D.S. Chung	Y.K. Cho	E-mail concerning joint defense, in connection with potential litigation	WP, JD
23	HRP 002273	HRP 002273	7/5/2000	Farhad Tabrizi	Dave Westergard	Jeff Mailloux	E-mail concerning joint defense, in connection with potential litigation	WP, JD
24	HRP 002275	HRP 002277	7/10/2000	"chas"mailto:cbyrd@austin.rr.com	Sun Choi; Ray W. Gapsin; Mario Martinez; John Radanovich; John Klinestiver; H.S. Kim; H.K. Minn; Hai D. Ho; Gary Swanson; Farhad Tabrizi; Clint Miller; C.K. chung; Al Kassak; Shafiqur Rahman		E-mail concerning joint defense, in connection with potential litigation	WP, JD
25	HRP 002278	HRP 002279	7/6/2000	Jeff Mailloux	Farhad Tabrizi; Dave Westergard	Jeff Mailloux	E-mail concerning joint defense, in connection with potential litigation	WP, JD
26	HRP 002280	HRP 002281	7/6/2000	Farhad Tabrizi	Jeff Mailloux		E-mail concerning joint defense, in connection with potential litigation	WP, JD

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27	HRP 002282	HRP 002283	7/6/2000	Farhad Tabrizi	Y.K. Cho	D.S. Chung	E-mail concerning joint defense, in connection with potential litigation	WP, JD
28	HRP 002284	HRP 002286	7/7/2000	Y.K. Cho	Farhad Tabrizi	Y.K. Cho	E-mail concerning joint defense, including reference to attorney-client communications, in connection with potential litigation	AC, WP, JD
29	HRP 002287	HRP 002288	7/9/2000	Farhad Tabrizi	Dave Westergard	Jeff Mailloux	E-mail concerning joint defense, in connection with potential litigation	WP, JD
30	HRP 002289	HRP 002290	7/10/2000	dwestergard	Farhad Tabrizi	Jeff Mailloux	E-mail concerning joint defense, in connection with potential litigation	WP, JD
31	HRP 002291	HRP 002295	7/10/2000	Y.K. Cho	Farhad Tabrizi	Ted Brown; I.H. Chun; K.H. Min. D.S. Chung	E-mail containing attorney-client communications re joint defense, in connection with potential litigation	AC, WP, JD
32	HRP 002296	HRP 002296	7/10/2000	Y.K. Cho	Farhad Tabrizi		E-mail containing attorney-client communications re joint defense, in connection with potential litigation	AC, WP, JD
33	HRP 002300	HRP 002302	7/11/2000	Dave Westergard	Farhad Tabrizi	Jeff Mailloux	E-mail concerning joint defense, in connection with potential litigation	WP, JD
34	HRP 002303	HRP 002305	7/10/2000	Farhad Tabrizi	Dave Westergard	Jeff Mailloux	E-mail concerning joint defense, in connection with potential litigation	WP, JD
35	HRP 002306	HRP 002308	7/10/2000	Farhad Tabrizi	Dave Westergard	Jeff Mailloux	E-mail concerning joint defense, in connection with potential litigation	WP, JD
36	HRP 002309	HRP 002309	7/4/2000	D.S. Chung	Farhad Tabrizi	K.H. Min; James Kim; JeeKang Seo; Chanwon Choi; I.H. Chun; M.B. Chung; Dongwon Shin; Jinho Lee; Jongho Lee; Ted Brown	E-mail containing attorney-client communications re joint defense, in connection with potential litigation	AC, WP, JD
37	HRP 002310	HRP 002311	7/5/2000	D.S. Chung	Farhad Tabrizi		E-mail containing attorney-client communications re joint defense, in connection with potential litigation	AC, WP, JD
38	HRP 002312	HRP 002313	7/5/2000	Y.K. Cho	Farhad Tabrizi	D.S. Chung; M.B. Chung; I.H. Chun; K.H. Min; changwon choi; Y.S. Kim; D.Y. Youm; Ted Brown	Email containing attorney-client communications re joint defense, in connection with potential litigation	AC, WP, JD

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39	HRP 002315	HRP 002316	7/5/2000	Farhad Tabrizi	Y.K. Cho	D.S. Chung; M.B. Chung; I.H. Chun; K.H. Min; changwon choi; Y.S. Kim; D.Y. Youm; Ted Brown; Mike Lee	E-mail containing attorney-client communications re joint defense, in connection with potential litigation	AC, WP, JD
40	HRP 002317	HRP 002318	7/5/2000	Y.K. Cho	Farhad Tabrizi	M.B. Chung; I.H. Chun; K.H. Min; changwon choi; Y.S. Kim; D.Y. Youm; Ted Brown; Mike Lee; D.S. Chung	E-mail containing attorney-client communications re joint defense, in connection with potential litigation	AC, WP, JD
41	HRP 002320	HRP 002322	7/6/2000	Farhad Tabrizi	Y.K. Cho	M.B. Chung; I.H. Chun; K.H. Min; changwon choi; Y.S. Kim; D.Y. Youm; Ted Brown; Mike Lee; D.S. Chung	E-mail containing attorney-client communications re joint defense, in connection with potential litigation	AC, WP, JD
42	HRP 002323	HRP 002325	7/7/2000	Farhad Tabrizi	Y.K. Cho	Y.K. Cho	E-mail containing attorney-client communications re joint defense, in connection with potential litigation	AC, WP, JD
43	HRP 002326	HRP 002328	7/7/2000	Y.K. Cho	Farhad Tabrizi	Y.K. Cho	E-mail containing attorney-client communications re joint defense, in connection with potential litigation	AC, WP, JD
44	HRP 002329	HRP 002331	7/8/2000	Y.K. Cho	Farhad Tabrizi; Ted Brown	I.H. Chun; K.H. Min	Email containing attorney-client communications re meeting about potential litigation with Rambus	AC, WP, JD
45	HRP 002332	HRP 002335	7/9/2000	Farhad Tabrizi	Y.K. Cho	Ted Brown; I.H. Chun; K.H. Min	Email containing attorney-client communications re meeting about potential litigation with Rambus	AC, WP, JD
46	HRP 002336	HRP 002339	7/9/2000	Ted Brown	Y.K. Cho	I.H. Chun; K.H. Min	Email containing attorney-client communications re meeting about potential litigation with Rambus	AC, WP, JD
47	HRP 002340	HRP 002344	7/10/2000	Ted Brown	Y.K. Cho; Farhad Tabrizi	D.S. Chung; I.H. Chun; K.H. Min	Email containing attorney-client communications re meeting about potential litigation with Rambus	AC, WP, JD
48	HRP 002345	HRP 002348	7/10/2000	Farhad Tabrizi	Y.K. Cho	Ted Brown; I.H. Chun; K.H. Min; D.S. Chung	Email containing attorney-client communications re meeting about potential litigation with Rambus	AC, WP, JD
49	HRP 002349	HRP 002352	7/9/2000	Y.K. Cho	Farhad Tabrizi	Ted Brown; I.H. Chun; K.H. Min; D.S. Chung	Email containing attorney-client communications re meeting about potential litigation with Rambus	AC, WP, JD

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50	HRP 002353	HRP 002359	7/11/2000	Y.K. Cho	Farhad Tabrizi	Ted Brown; I.H. Chun; D.S. Chung; K.H. Min	Email containing attorney-client communications re meeting about potential litigation with Rambus	AC, WP, JD
51	HRP 002360	HRP 002365	7/11/2000	Y.K. Cho	Farhad Tabrizi	Ted Brown; I.H. Chun; D.S. Chung; K.H. Min	Email containing attorney-client communications re meeting about potential litigation with Rambus	AC, WP, JD
52	HRP 002366	HRP 002370	7/10/2000	Y.K. Cho	Farhad Tabrizi	Ted Brown; D.S. Chung; I.H. Chun; K.H. Min.	Email containing attorney-client communications re meeting about potential litigation with Rambus	AC, WP, JD
53	HRP 002371	HRP 002375	7/10/2000	Farhad Tabrizi	Ted Brown	Y.K. Cho; D.S. Chung; I.H. Chun; K.H. Min	Email containing attorney-client communications re meeting about potential litigation with Rambus	AC, WP, JD
54	HRP 002376	HRP 002378	6/29/2000	Y.K. Cho	Seung-Han Ahn	Farhad Tabrizi; D.S. Chung; M.B. Chung; I.H. Chun; K.H. Min; changwon choi; jee-kang seo; Moonso Kim; J.Y. sohn; I.H. Chun	E-mail concerning joint defense, in connection with potential litigation	WP, JD
55	HRP 002379	HRP 002381	6/30/2000	Seung-Han Ahn	Y.K. Cho; Farhad Tabrizi		E-mail concerning joint defense, in connection with potential litigation	WP, JD
56	HRP 002382	HRP 002384	6/29/2000	Y.K. Cho	Farhad Tabrizi	Seung Han Ahn	E-mail concerning joint defense, in connection with potential litigation	WP, JD
57	HRP 002385	HRP 002386	6/29/2000	Farhad Tabrizi	Y.K. Cho	Seung Han Ahn	E-mail concerning joint defense, in connection with potential litigation	WP, JD
58	HRP 002387	HRP 002388	6/29/2000	Y.K. Cho	Farhad Tabrizi; Seung Han Ahn		E-mail concerning joint defense, in connection with potential litigation	WP, JD
59	HRP 002391	HRP 002391	6/28/2000	Jan du Dupreez	Farhad Tabrizi		E-mail concerning joint defense, in connection with potential litigation	WP, JD
60	HRP 002392	HRP 002394	6/28/2000	D.S. Chung	Sang Park	C.S. Park; I.H. Chun; K.H. Min; James Kim; JeeKang Seo; changwon choi; Dongwon Shin; jinho; jongholee; Ted Brown; M.B. Chung; Farhad Tabrizi	Email containing attorney-client communications re response to Rambus letter, in connection with potential	AC, WP, JD
61	HRP 002395	HRP 002397	6/28/2000	Farhad Tabrizi	Jini Park		E-mail concerning joint defense, in connection with potential litigation	WP, JD
62	HRP 002398	HRP 002398	6/27/2000	Farhad Tabrizi	Jan du Dupreez		E-mail concerning joint defense, in connection with potential litigation	WP, JD

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No.	Bates Start	Bates End	Date of Document	Author	Recipient	CC.	Description	Claim
63	HRP 002408	HRP 002408	6/27/2000	Jeff Mailloux	Farhad Tabrizi; chung.w.lam@intel.com; Jeff Mailloux; Jan du Dupreez		E-mail concerning joint defense, in connection with potential litigation	WP, JD
64	HRP 002409	HRP 002409	6/27/2000	Jan du Dupreez	Farhad Tabrizi		E-mail concerning joint defense, in connection with potential litigation	WP, JD
65	HRP 002421	HRP 002421	6/27/2000	Farhad Tabrizi	h-inukai@lsi.nec.co.jp		E-mail concerning joint defense, in connection with potential litigation	WP, JD
66	HRP 002422	HRP 002422	6/27/2000	Farhad Tabrizi	jhawkins@ssi.samsung.com	C.S. Park; D.A.S. Kim; H.J. Shin; Farhad Tabrizi	E-mail concerning joint defense, in connection with potential litigation	WP, JD
67	HRP 002423	HRP 002423	6/27/2000	Farhad Tabrizi	chung.w.lam@intl.com; Jeff Mailloux; Jan du Dupreez		E-mail concerning joint defense, in connection with potential litigation	WP, JD
68	HRP 002424	HRP 002424	6/27/2000	Farhad Tabrizi	H.J. Shin		E-mail concerning joint defense, in connection with potential litigation	WP, JD
69	HRP 002425	HRP 002427	6/26/2000	Sang Park	Y. Park; I.H. Chun; S.Choi	C.S. Park; D.A.S. Kim; H.J. Shin; Farhad Tabrizi	E-mail concerning joint defense, in connection with potential litigation	WP, JD
70	HRP 002431	HRP 002431	6/23/2000	D.S. Chung	Seung Han Ahn	Y.K.J. Cho; Farhad Tabrizi; S. Park; K.H. Min; James Kim; JeeKangSeo; changwon choi; I.H. Chun; M.B. Chung; Dongwon Shin; jinho; jongholee	E-mail concerning joint defense, in connection with potential litigation	WP, JD
71	HRP 002432	HRP 002433	6/23/2000	D.S. Chung	Farhad Tabrizi	Y.K. Cho; I.H. Chun; Seung Han Ahn; Hal Hofherr; K.H. Min; changwon choi; jee-kang seo; Moonsu Kim; J.Y. Sohn; Y.K. Cho	E-mail concerning joint defense, in connection with potential litigation	WP, JD
72	HRP 002434	HRP 002440	6/23/2000	Farhad Tabrizi	Y.K. Cho	D.S. Chung; I.h. Chun; Seung Han Ahn; Hal Hofherr; K.H. Min; changwon choi; jee-kang seo; Moonsu Kim J.Y. Sohn; Y.K. cho	E-mail concerning joint defense, in connection with potential litigation	WP, JD
73	HRP 002443	HRP 002443	6/22/2000	Farhad Tabrizi	Sang Park	schoi@hei.co.kr; daskim@hmec.co.kr; C.S. Park; I.H. Chun	E-mail concerning joint defense, in connection with potential litigation	WP, JD
74	HRP 002444	HRP 002445	6/20/2000	Sang Park	Farhad Tabrizi	S.Choi; D.A.S. Kim; .S. Park; I.H. Chun	E-mail concerning joint defense, in connection with potential litigation	WP, JD
75	HRP 002456	HRP 002458	6/22/2000	Farhad Tabrizi	Sang Park	S.Choi; D.A.S. Kim; C.S. Park; I.H. Chun	E-mail concerning joint defense, in connection with potential litigation	AC, WP, JD
76	HRP 002459	HRP 002460	6/19/2000	Sang Park	Farhad Tabrizi	S.Choi; D.A.S. Kim; C.S. Park; I.H. Chun	E-mail concerning joint defense, in connection with potential litigation	AC, WP, JD

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77	HRP 002461	HRP 002463	6/19/2000	Farhad Tabrizi	Hal Hofherr		Email containing attorney-client communications re Toshiba SDRAM/DDR DRAM patent license with Rambus, in connection with potential litigation	AC, WP, JD
78	HRP 002464	HRP 002465	6/19/2000	Y.K. Cho	Farhad Tabrizi	S. Park; I.B. Jeon; D.S. Chung; C.S. Chung; S. Choi; Seung Han Ahn; Hal Hofherr; D.S.Chung; I.H. Chun	Email containing attorney-client communications re Toshiba SDRAM/DDR DRAM patent license with Rambus, in connection with potential litigation	AC, WP, JD
79	HRP 002466	HRP 002467	6/12/2000	Farhad Tabrizi	Ted Brown; Hal Hofherr	I.B. Jeon; Y.K. Cho	Email containing attorney-client communications re strategy re Rambus patents, in connection with potential	AC, WP, JD
80	HRP 002468	HRP 002469	6/11/2000	Y.K. Cho	Farhad Tabrizi; Hal Hofherr		Email containing attorney-client communications re strategy re Rambus patents, in connection with potential	AC, WP, JD
81	HRP 002470	HRP 002472	6/8/2000	Ted Brown	Farhad Tabrizi	djyum@hei.co.kr; D.S. Chung; haewon@hei.co.kr; I.H. Chun; jeek92@hei.co.kr; jongholee@hei.co.kr; K.H. Min; M.B. Chung; Y.K. Cho; Y.S. Kim; moonsu@hmec.co.kr.	Email containing attorney-client communications re strategy re Rambus patents, in connection with potential litigation	AC, WP, JD
82	HRP 002473	HRP 002475	6/8/2000	Dong-Soo Chung	Ted Brown	Y.K. Cho; M.B. Chung; I.H. Chun; K.H. Min; cchangwon choi; jee-kang seo; Moonsu Kim; Y.S. Kim; D.Y. Youm; jongholee; Farhad Tabrizi	Email containing attorney-client communications re strategy re Rambus patents, in connection with potential	AC, WP, JD
83	HRP 002478	HRP 002479	6/7/2000	Y.K. Cho	Farhad Tabrizi	D.S. Chung; M.B. Chung; I.H. Chun; K.H. Min; changwon choi; jee-kan seo; Moonsu Kim; K.H. Min; changwon choi; Y.S. Kim; D.Y. Youm; jongholee	Email containing attorney-client communications re strategy re Rambus patents, in connection with potential	AC, WP, JD
84	HRP 002484	HRP 002487	5/22/2000	Dong-Soo Chung	Hal Hofherr	changwon choi; K.H. Min; sungchang kang; Y.K. Cho; Yongsung Kim; Jeekang Seo; Moonsu Kim; I.H. Chun; M.B. Chung; etkim; jongholee I.B. Jeon; Farhad Tabrizi; S. Park.	Email containing attorney-client communications re strategy re nVidia request for indemnity, in connection with potential litigation	AC, WP, JD
85	HRP 002488	HRP 002489	5/21/2000	Farhad Tabrizi	Sang Park	D.S. Chung; S. Choi; I.B. Jeon; Y.K. Cho; sslee@hmec.co.kr; Seung Han Ahn; Mario Martinez; daskim@hmec.co.kr.; H.S. Kim	E-mail concerning joint defense, in connection with potential litigation	WP, JD
86	HRP 002490	HRP 002491	5/21/2000	Y.K. Cho	Farhad Tabrizi		E-mail concerning nVidia indemnification, joint defense, in connection with potential litigation	WP, JD

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87	HRP 002492	HRP 002493	5/21/2000	Sang Park	Farhad Tabrizi; D.S. Chung; S. Choi	I.B. Jeon; Y.K. Cho; ssllee@hmec.co.kr; Seung Han Ahn; Mario Martinez; daskim@hmec.co.kr.; H.S. Kim.	E-mail concerning nVidia indemnification, joint defense, in connection with potential litigation	WP, JD
88	HRP 002621	HRP 002623	7/11/2000	Farhad Tabrizi	Dave Westergard	jmailloux@micron.com	E-mail concerning joint defense, in connection with potential litigation	WP, JD
89	HRP 002624	HRP 002629	7/11/2000	Farhad Tabrizi	Y.K. Cho	Ted Brown; I.H. Chun; D.S. Chung; K.H. Min	E-mail containing attorney-client communications re meeting re Rambus case, in connection with potential litigation	AC, WP, JD
90	HRP 002653	HRP 002669	7/26/2000	Ted Brown	Dave Westergard; Paul Carmichael; Robert Masters	Farhad Tabrizi; Hal Hofherr; Y.K. Cho	E-mail containing attorney-client communications and legal advice re Joint Representation Agreement	AC, WP, JD
91	HRP 002681	HRP 002684	7/27/2000	Robert M. Masters	Ted Brown; Dave Westergard; Paul Carmichael; Robert M. Masters	Farhad Tabrizi; Hal Hofherr; Y.K. Cho; dashmore@micron.com; Mark Friedman	E-mail containing attorney-client communications and legal advice re Joint Representation Agreement	WP, JD
92	HRP 002687	HRP 002687	7/28/2000	Ted Brown	D.S. Chung; Farhad Tabrizi; Hal Hofherr; I.H. Chun; S. Choi; S. Park; Y.K. Cho; H.J. Shin		E-mail containing attorney-client communications and legal advice re Rambus Teleconference Summary, in connection with potential litigation	AC, WP, JD
93	HRP 002691	HRP 002692	7/25/2000	Sang Park	Farhad Tabrizi		E-mail concerning joint defense, in connection with potential litigation	WP, JD
94	HRP 002693	HRP 002694	7/20/2000	Ted Brown	Y.K. Cho	D.S. Chung; Farhad Tabrizi; haewon@hei.co.kr; I.H. Chun; jeek92@hei.co.kr; jysohn@hei.co.kr; K.H. Min; M.B. Chung; moonsu@hmec.co.kr	E-mail containing attorney-client communications re collecting information re Rambus, in connection with potential litigation	AC, WP, JD
95	HRP 002695	HRP 002695	7/21/2000	Ted Brown	D.S. Chung; Farhad Tabrizi; Hal Hofherr; I.H. Chun; M.B. Chung; S. Choi; S. Park; Y.K. Cho	Anna Goodall	E-mail containing attorney-client communications re NDA and Joint Representation Agreement, in connection with potential litigation	AC, JD
96	HRP 002696	HRP 002699	7/19/2000	Farhad Tabrizi	Ted Brown	Y.K. Cho; D.S. Chung; Hal Hofherr; I.B. Jeon; I.H. Chun; M.B. Chung; S. Choi; mailto:Spark@hei.co.kr S. Park	E-mail containing attorney-client communications and legal advice re NDA and Joint Representation Agreement	AC, WP, JD

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97	HRP 002700	HRP 002700	7/19/2000	Farhad Tabrizi	J. Reese Brown		E-mail re Rambus/DDR comparison file, in connection with potential litigation	WP, JD
98	HRP 002701	HRP 002701	7/19/2000	J. Reese Brown	Farhad Tabrizi		E-mail re Rambus/DDR comparison file, in connection with potential litigation	WP, JD
99	HRP 00271	HRP 002714	7/19/2000	Ted Brown	Farhad Tabrizi	D.S. Chung; Hal Hofherr; I.B. Jeon; I.H. Chun; M.B. Chung; S. Choi; S. Park; J.Y. Cho	E-mail containing attorney-client communications and legal advice re NDA and Joint Representation Agreement, in connection with potential litigation	AC, WP, JD
100	HRP 002715	HRP 002715	7/19/2000	J. Reese Brown	Farhad Tabrizi		E-mail re Rambus/DDR comparison file, in connection with potential litigation	AC, JD
101	HRP 002723	HRP 002724	7/19/2000	J. Reese Brown	Farhad Tabrizi		E-mail re information needed from JEDEC, in connection with potential litigation	WP, JD
102	HRP 002725	HRP 002728	7/19/2000	Ted Brown	Y.K. Cho	D.S.Chung; Farhad Tabrizi; I.H. Chun; M.B. Chung; cileffler@townsend.comp; Eugene Crew; pcole@townsend.com	E-mail containing attorney-client communications and legal advice re information needed from JEDEC	AC, WP, JD
103	HRP 002729	HRP 002731	7/19/2000	Ted Brown	Y.K. Cho	D.S. Chung; Farhad Tabrizi; I.H. Chun; M.B. Chung; cileffler@townsend.com; Eugene Crew; pcole@townsend.com	E-mail containing attorney-client communications and legal advice re information needed from JEDEC	AC, WP, JD
104	HRP 002732	HRP 002735	7/19/2000	Ted Brown	Y.K. Cho	D.S. Chung; Farhad Tabrizi; Hal Hofherr; I.B. Jeon; I.H. Chun; M.B. Chung; S. Choi; S. Park	E-mail containing attorney-client communications and legal advice re NDA and Joint Representation Agreement	AC, WP, JD
105	HRP 002736	HRP 002739	7/19/2000	Ted Brown	D.S.Chung	Farhad Tabrizi; Hal Hofherr; I.B. Jeon; I.H. Chun; M.B. Chung; S. Choi; S. Park; Y.K. Cho	E-mail containing attorney-client communications and legal advice re NDA and Joint Representation Agreement	AC, WP, JD
106	HRP 002740	HRP 002742	7/19/2000	Ken McGhee	Farhad Tabrizi	desi.rhoden@ami2.com; fredj@bewellnet.com; J. Reese Brown; charles_furnweger@el.nec.com; foss@mosaid.com; bilge@transmeta.com; fred@unimem.bom	E-mail re information needed from JEDEC, in connection with potential litigation	WP, JD
107	HRP 002743	HRP 002746	7/18/2000	Y.K. Cho	Ted Brown	Farhad Tabrizi; Hal Hofherr; D.S. Chung; I.B. Jeon; I.H. Chun; M.B. Chung; S. Choi; spark@hei.co.kr	E-mail containing attorney-client communications and legal advice re NDA and Joint Representation Agreement	AC, WP, JD

DOCUMENTS AS TO WHICH HYNIX CLAIMS "JOINT DEFENSE PRIVILEGE"

No.	Bates Start	Bates End	Date of Document	Author	Recipient	CC.	Description	Claim
108	HRP 002747	HRP 002750	7/18/2000	Sang Park	Inhwan Chun; Ted Brown; Farhad Tabrizi; Hal Hofherr	D.S. Chung; I.B. Jeon; M.B. Chung; s. Choi; Y.K. Cho	E-mail containing attorney-client communications and legal advice re NDA and Joint Representation Agreement	AC, WP, JD
109	HRP 002751	HRP 002754	7/18/2000	Inhwan Chun	Ted Brown; Farhad Tabrizi; Hal Hofherr	D.S. Chung; I.B. Jeon; M.B. Chung; S. Choi; S. Park; Y.K. Cho	E-mail containing attorney-client communications and legal advice re NDA and Joint Representation Agreement	AC, WP, JD
110	HRP 002755	HRP 002757	7/18/2000	D.S. Chung	Ted Brown	Farhad Tabrizi; Hal Hofherr; I.B. Jeon; I.H. Chun; M.B. Chung; S. Choi; S. Park; Y.K. Cho	E-mail containing attorney-client communications and legal advice re NDA and Joint Representation Agreement	AC, WP, JD
111	HRP 002758	HRP 002760	7/18/2000	Ted Brown	Farhad Tabrizi; Hal Hofherr	D.S. Chung; I.B. Jeon; I.H. Chun; M.B. Chung; S. Choi; S. Park; Y.K. Cho	E-mail containing attorney-client communications and legal advice re NDA and Joint Representation Agreement	AC, WP, JD
112	HRP 002761	HRP 002766	7/18/2000	Hal Hofherr	Farhad Tabrizi	Ted Brown; M.B. Chung; I.H. Chun; D.S. Chung; I.B. Jeon; S. Choi; Sang Park	E-mail containing attorney-client communications and legal advice re NDA and Joint Representation Agreement	AC, WP, JD
113	HRP 002767	HRP 002771	7/18/2000	Farhad Tabrizi	Ted Brown; M.B. Chung; I.H. Chun; D.S. Chung; Hal Hofherr; I.B. Jeon; S. Choi; Sang Park		E-mail containing attorney-client communications re NDA and Joint Representation Agreement, in connection with potential litigation	AC, WP, JD
114	HRP 002772	HRP 002775	7/18/2000	Robert M. Masters	J. Maillooux; Julian Hawkins; Jeffrey Lee; David Chong; Taae Sung Jung; Jan du Dupreez; Ikeda Hiroyaki; h-inukai@lsi.nec.co.jp; Farhad Tabrizi; Chung W. Lam	dashmore@micron.com; Mark Friedman; Carl J. Pellegrini	E-mail containing attorney-client communications re NDA and Joint Representation Agreement, in connection with potential litigation	WP, JD
115	HRP 002777	HRP 002778	7/18/2000	J. Reese Brown	Farhad Tabrizi		E-mail re information needed from JEDEC, in connection with potential litigation	WP, JD
116	HRP 002779	HRP 002780	7/17/2000	Farhad Tabrizi	J. Reese Brown	Ken McGhee; desi.rhoden@ami2.com; foss@mosaid.com; fredj@bewellnet.com; fred@unimem.com; charles_furnweger@el.nec.com; bilge@transmeta.com	E-mail re information needed from JEDEC, in connection with potential litigation	WP, JD
117	HRP 002782	HRP 002782	7/17/2000	J. Reese Brown	Farhad Tabrizi	Ken McGhee; desi.rhoden@ami2.com; charles_furnweger@el.nec.com; bilge@transmeta.com; foss@mosaid.com; fredj@bewellnet.com; fred@unimem.commailto:foss@mosaid.com;	E-mail re information needed from JEDEC, in connection with potential litigation	WP, JD

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No.	Bates Start	Bates End	Date of Document	Author	Recipient	CC.	Description	Claim
118	HRP 002784	HRP 002784	7/17/2000	Farhad Tabrizi	Ken McGhee	J. Reese Brown; desi.rhoden@ami2.com; charles_furnweger@el.nec.com; bilge@transmeta.com; foss@mosaid.com; fredj@bewellnet.cm; fred@unimem.bom	E-mail re information needed from JEDEC, in connection with potential litigation	WP, JD
119	HRP 002785	HRP 002785	7/14/2000	Ted Brown	D.S. Chung; Y.K. Cho; Farhad Tabrizi; I.H. Chun; Y.K. Cho		E-mail re information needed from JEDEC, in connection with potential litigation	AC, WP, JD
120	HRP 002792	HRP 002794	7/24/2000	Farhad Tabrizi	Ted Brown	Y.K. Cho	E-mail containing attorney-client communications re information needed from JEDEC, in connection with potential litigation	AC, WP, JD
121	HRP 002795	HRP 002798	7/24/2000	Ted Brown	Farhad Tabrizi	Y.K. Cho	E-mail containing attorney-client communications re information needed from JEDEC, in connection with potential litigation	AC, WP, JD
122	HRP 002801	HRP 002802	7/24/2000	Farhad Tabrizi	S. Choi	mikelee@hmec.co.kr	E-mail re status of Rambus patent issues, in connection with potential litigation	WP, JD
123	HRP 002803	HRP 002805	7/24/2000	Ken McGhee	Farhad Tabrizi		E-mail re information needed from JEDEC, in connection with potential litigation	WP, JD
124	HRP 002806	HRP 002806	7/24/2000	Farhad Tabrizi	Ken McGhee		E-mail re information needed from JEDEC, in connection with potential litigation	WP
125	HRP 002807	HRP 002807	7/24/2000	S. Choi	Farhad Tabrizi	mikelee@hmec.co.kr	E-mail containing attorney-client communications re NDA and Joint Representation Agreement, in connection with potential litigation	WP, JD
126	HRP 002808	HRP 002808	7/24/2000	Sang Park	Steve Appleton	Farhad Tabrizi	E-mail concerning joint defense, in connection with potential litigation	WP, JD
127	HRP 002810	HRP 002811	7/25/2000	Robert M. Masters	J. Mailloux;; Julian Hawkins; Jeffrey Lee; David Chong;; Tae Sung Jung; Jan du Dupreez; Ikeda Hiroyaki; H-Inukai@Lsi.Nec.co.Jp; Farhad Tabrizi; Chung W. Lam	dashmore@micron.com; Mark Friedman; Carl J. Pellegrini	E-mail concerning joint defense, in connection with potential litigation	WP, JD
128	HRP 00297	HRP 002299	7/11/2000	Dave Westergard	Farhad Tabrizi	Jeff Mailloux	E-mail concerning joint defense, in connection with potential litigation	WP, JD

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No.	Bates Start	Bates End	Date of Document	Author	Recipient	CC.	Description	Claim
129	HRP 003807	HRP 003807	7/28/2000	Joo-Sun Choi	Farhad Tabrizi		Email re ADT IP meeting with Sughrue attorney, in connection with potential litigation	WP, JD
130	HRP 003812	HRP 003812	6/27/2000	Julian Hawkins	Farhad Tabrizi		E-mail re joint defense, in connection with potential litigation	JD
131	HRP 003813	HRP 003818	6/27/2000		Farhad Tabrizi		E-mail re Hitachi-Rambus action, JEDEC issues, in connection with potential litigation	WP, JD
132	HRP 003819	HRP 003820	6/27/2000	Farhad Tabrizi	cbyrd@austin.rr.com		E-mail re joint defense, in connection with potential litigation	JD
133	HRP 004671	HRP 004671	1/24/2001	Nancy D'Erasmio,	Stephen J. Akerly		Correspondence with enclosures regarding documents discussed at the 1/17/01 JRA meeting	JD
134	HRP 004672	HRP 004672	12/17/2002	Clifford E. Wilkins, Jr.	Robert M. Stern, Kenneth L. Nissley		Correspondence with attachments regarding copies of the ADT-related documents appearing on Samsung's privilege log	JD
135	HRP 004673	HRP 004673	Undated	Sughure	Theodore G. Brown, III		Binder of Prior Art	JD
136	HRP 004674	HRP 004674	Undated	Sughure	Theodore G. Brown, III		Binder of Prior Art	JD
137	HRP 004675	HRP 004675	Undated	Sughure	Theodore G. Brown, III		Binder of Prior Art	JD
138	HRP 004676	HRP 004676	8/21/00	David Ashmore	Theodore G. Brown, III		Email regarding next week meetings	JD
139	HRP 004677	HRP 004691	7/16/2000	Unknown	Theodore G. Brown, III		Draft of Joint Defense Agreement	JD
140	HRP 004692	HRP 004699	7/25/2000	Robert M. Masters	Theodore G. Brown, III		Email regarding attachment of draft Joint Defense Agreement	JD
141	HRP 004700	HRP 004706	8/10/2000	Farhad Tabrizi	Robert M. Masters	Theodore G. Brown, III; D.S. Chung	Facsimile regarding signed copy of Joint Defense Agreement	JD
142	HRP 004707	HRP 0047010	8/10/2000	Dave Westergard	Theodore G. Brown, III		Email regarding NDA to permit discussions to begin	JD
143	HRP 004711	HRP 004711	2/21/2000	Sabrina Johnson	Grant Rowan, Esq.		Correspondence regarding documents that have been D-designated by court order	JD
144	HRP 004712	HRP 004712	11/28/2000	Nancy D'Erasmio, Catherine M.	Jordan Trent Jones, Esq.		Correspondence regarding documents for his review	JD
145	HRP 004713	HRP 004713	11/28/2000	Langston	Grant Rowan, Esq.		Correspondence regarding documents for his review	JD

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No.	Bates Start	Bates End	Date of Document	Author	Recipient	CC.	Description	Claim
146	HRP 004714	HRP 004714	10/31/2000	Catherine M. Langston	Grant Rowan, Esq.		Correspondence regarding documents for his review	JD
147	HRP 004715	HRP 004715	10/30/2000	Catherine M. Langston	Grant Rowan, Esq.		Correspondence regarding documents for his review	JD
148	HRP 004716	HRP 004716	10/13/2000	Catherine M. Langston	Grant Rowan, Esq.		Correspondence regarding documents for his review	JD
149	HRP 004717	HRP 004724	8/10/2000	Farhad Tabrizi	Robert M. Masters	Theodore G. Brown, III; D.S. Chung	Facsimile regarding signed copy of Joint Defense Agreement	JD
150	HRP 004725	HRP 004725	Undated				Sign-in Sheet for Meeting	JD
151	HRP 004726	HRP 004733	8/10/2000	Farhad Tabrizi	Robert M. Masters	Theodore G. Brown, III; D.S. Chung	Facsimile regarding signed copy of Joint Defense Agreement	JD
152	HRP 004734	HRP 004752	7/12/2000	Robert M. Masters; Carl J. Pellegrini			Presentation: ADT IP/Patent Review	JD
153	HRP 004753	HRP 004873	7/7/2000				Rambus Patents of Interest	JD