

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

ADVANCED MICRO DEVICES, INC., a)
Delaware corporation, and AMD)
INTERNATIONAL SALES & SERVICE,) Civil Action No. 05-441 JJF
LTD., a Delaware corporation,)
)
Plaintiffs,)
)
vs.)
)
INTEL CORPORATION, a Delaware)
corporation, and INTEL KABUSHIKI)
KAISHA, a Japanese corporation,)
)
Defendants.)

IN RE:)
) Civil Action No. 05-MD-1717-JJF
INTEL CORPORATION)

**OBJECTIONS OF THIRD PARTY GLOVER PARK GROUP AND OF PLAINTIFFS
ADVANCED MICRO DEVICES, INC. AND AMD INTERNATIONAL SALES &
SERVICE, LTD. TO INTEL CORPORATION’S AND INTEL KABUSHIKI KAISHA’S
SUBPOENA ISSUED TO GLOVER PARK GROUP**

Pursuant to the Federal Rules of Civil Procedure, including Rules 26 and 45, and the Local Rules of the United States District Court for the District of Delaware, third party Glover Park Group and plaintiffs Advanced Micro Devices, Inc., and AMD International Sales & Service, Ltd. (collectively, “AMD”),¹ each on its own behalf and together, hereby object to the subpoena served upon Glover Park Group (“Glover Park”) by defendants Intel Corporation and Intel Kabushiki Kaisha (collectively, “Intel”).

¹ In the subpoena, AMD is defined to include, among other things, its “agents and representatives” and AMD asserts these objections on their behalf, including on behalf of its counsel, O’Melveny & Myers LLP. For the avoidance of doubt, however, O’Melveny & Myers LLP, also separately objects to the production of material sought by this subpoena, including material that is protected from disclosure by the attorney-client privilege, the attorney-work product doctrine, and other applicable privileges or protections.

GENERAL OBJECTIONS

Glover Park and AMD each assert the following General Objections in response to each and every Request in the subpoena, whether or not they are separately stated in each response:

1. Glover Park and AMD each objects to each and every Request, and to the subpoena in its entirety, on the ground that it is an inappropriate effort to invade the attorney-client privilege and work product privileges and is propounded for improper tactical purposes and not for the purpose of obtaining discoverable information. Glover Park and AMD also each objects to the subpoena as a whole and to each individual Request on the ground that it specifically calls for information that is protected from disclosure by the attorney-client privilege, the attorney work product doctrine, and other applicable privileges and protections. Glover Park will not provide any such privileged or protected information.

2. Glover Park and AMD each objects to each and all of Intel's purported "Instructions" to the extent they purport to impose obligations that are unauthorized by, additional to, or inconsistent with Rules 26 or 45 of the Federal Rules of Civil Procedure or the Local Rules of the United States District Court for the District of Delaware. Glover Park will not comply with any such unauthorized, additional, or inconsistent instructions.

3. Glover Park and AMD each objects to each and every Request to the extent it calls for information that contains or reveals trade secrets or other confidential research, development, commercial, financial, or personnel information, which, if disclosed or disseminated without restriction to Intel or third parties, could adversely impact AMD's or Glover Park's business. Glover Park will not produce any such confidential information except pursuant to the protective order.

4. Glover Park and AMD each objects to each and every Request to the extent it calls for information held subject to contractual or other legal obligations of confidentiality owed to its employees, clients, customers, or other third parties. Glover Park will not produce any such third party confidential information except pursuant to the protective order.

5. Glover Park and AMD each objects to Intel's definition of the word "customer" as vague, ambiguous, and overbroad. Using that definition renders these Requests unduly burdensome, and results in their seeking information that is not relevant to the claim or defense of any party or reasonably calculated to lead to the discovery of admissible evidence.

6. Glover Park and AMD each objects to Intel's definition of the words "relate to," "relating to," "related to" and "concerning," as vague, ambiguous, and overbroad. Using that definition renders these Requests unduly burdensome, and results in their seeking information that is not relevant to the claim or defense of any party or reasonably calculated to lead to the discovery of admissible evidence.

7. Glover Park and AMD each objects to the Requests in that they seek information that is neither relevant to the claims or defenses of a party nor reasonably likely to lead to the discovery of admissible evidence, and information that, even if it were relevant, could be obtained from other sources that would not require the production of information protected by the attorney-client privilege, the work product doctrine, or other applicable privileges and protections.

8. Glover Park and AMD would be willing, and hereby offer, to meet and confer with Intel about Intel's Requests and Glover Park and AMD's objections.

RESPONSES TO REQUESTS

REQUEST NO. 1:

All documents concerning or relating to any litigation proposed or contemplated by AMD against Intel.

RESPONSE TO REQUEST NO. 1:

Glover Park and AMD incorporate their General Objections into this Response. Glover Park and AMD also object to this Request on the ground that it is vague and ambiguous, overbroad, and unduly burdensome. Glover Park and AMD also object to this Request on the ground that it calls for the production of documents and information that is neither relevant to the claims or defenses of a party, nor reasonably likely to lead to the discovery of admissible evidence. Glover Park and AMD further object to this Request on the ground that it seeks information that is protected by the attorney-client privilege, the work product doctrine and other applicable privileges and protections. Glover Park will not produce documents in response to this Request as drafted.

REQUEST NO. 2:

All documents concerning or relating to any communications with AMD, the law firm of O'Melveny & Meyers LLP, and/or any other persons acting on AMD's behalf, concerning or related to any litigation proposed or contemplated by AMD against Intel.

RESPONSE TO REQUEST NO. 2:

Glover Park and AMD incorporate their General Objections into this Response. Glover Park and AMD also object to this Request on the ground that it is vague and ambiguous, overbroad, and unduly burdensome. Glover Park and AMD also object to this Request on the

ground that it calls for the production of documents and information that is neither relevant to the claims or defenses of a party, nor reasonably likely to lead to the discovery of admissible evidence. Glover Park and AMD further object to this Request on the ground that it seeks information that is protected by the attorney-client privilege, the work product doctrine and other applicable privileges and protections. Glover Park will not produce documents in response to this Request as drafted.

RESPONSE TO REQUEST NO. 3:

All documents concerning or relating to any possible or actual investigation of Intel by the United States or a foreign governmental entity.

RESPONSE TO REQUEST NO. 3:

Glover Park and AMD incorporate their General Objections into this Response. Glover Park and AMD also object to this Request on the ground that it is vague and ambiguous, overbroad, and unduly burdensome. Glover Park and AMD also object to this Request on the ground that it calls for the production of documents and information that is neither relevant to the claims or defenses of a party, nor reasonably likely to lead to the discovery of admissible evidence. Glover Park and AMD further object to this Request on the ground that it seeks information that is protected by the attorney-client privilege, the work product doctrine and other applicable privileges and protections. Glover Park will not produce documents in response to this Request as drafted.

REQUEST NO. 4:

All documents concerning or relating to any communications with AMD, the law firm of O'Melveny & Meyers, LLP, and/or any other persons acting on AMD's behalf, concerning or

relating to any possible or actual investigation of Intel by the United States or a governmental entity.

RESPONSE TO REQUEST NO. 4:

Glover Park and AMD incorporate their General Objections into this Response. Glover Park and AMD also object to this Request on the ground that it is vague and ambiguous, overbroad, and unduly burdensome. Glover Park and AMD also object to this Request on the ground that it calls for the production of documents and information that is neither relevant to the claims or defenses of a party, nor reasonably likely to lead to the discovery of admissible evidence. Glover Park and AMD further object to this Request on the ground that it seeks information that is protected by the attorney-client privilege, the work product doctrine and other applicable privileges and protections. Glover Park will not produce documents in response to this Request as drafted.

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Dated: June 18, 2007

/s/Frederick L. Cottrell, III

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CERTIFICATE OF SERVICE

I hereby certify that on the 18th day of June, 2007, true and correct copies of the foregoing were caused to be served on counsel of record at the following addresses as indicated:

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