



Corporation and Intel Kabushiki Kaisha (hereafter jointly, "Intel"), though their counsel of record, together with Interim Class Counsel for the plaintiffs in the class actions in MDL No. 1717 ("MDL Class Actions"), hereby submit the following stipulation for the Court's approval:

**WHEREAS**, AMD, Intel and Interim Class Counsel have negotiated and agreed to a Proposed Protective Order which, if approved, will govern claims of confidentiality for all documents produced in the above litigations (and the parties anticipate will also govern confidentiality claims in the California Class Litigation which encompasses all actions filed by or on behalf of a putative California class of indirect purchasers of Intel microprocessors, including certain actions which have been or will be transferred to the Honorable Jack Komar of the Santa Clara County Superior Court by the Judicial Council for the State of California under JCCP 4443); and

**WHEREAS**, AMD has served, and Intel and Interim Class Counsel intend to serve, subpoenas duces tecum upon a number of corporate third parties (hereafter the "Noticed Third Parties"); and

**WHEREAS**, these subpoenas are likely to require the production of a number of documents for which the Noticed Third Parties are likely to seek confidential treatment under any protective order the Court may enter; and

**WHEREAS** given the Noticed Third Parties' interest in the terms of any protective order, the parties agree that Noticed Third Parties should be afforded an opportunity to raise any concerns or objections to the Proposed Protective Order before any such order is entered by the Court;

NOW, THEREFORE, IT IS HEREBY STIPULATED BY AND BETWEEN AMD AND INTEL, THROUGH THEIR RESPECTIVE COUNSEL, AND INTERIM CLASS COUNSEL, AND SUBJECT TO THE APPROVAL OF THE COURT, AS FOLLOWS:

1. On or before May 1, 2006, the parties shall serve a Notice of Proposed Protective Order, in the form attached as Exhibit A, together with the Proposed Protective Order, on all Noticed Third Parties currently under AMD subpoena and other corporate third parties that the parties or class parties have, as of this time, decided to serve with subpoenas *duces tecum*. Such Notice may be served



