(c)   AMD's knowledge of whether Custodians followed the instructions or recommendations included in the litigation hold notices;

(d)   Monitoring and auditing; and

(e)   IT Department technical support.

6.   AMD's harvesting of electronic data for this Litigation from all geographic locations and sources (hard drives, live exchange server mailboxes, Enterprise Vault, email journaling), including but not limited to:

(a)   Identity of entities and personnel conducting harvests;

(b)   Protocols and processes used;

(c)   Types of data included and excluded from harvests;

(d)   Timing of harvesting activities;

(e)   Identity of custodians subject to harvesting; and

(f)   Documentation, auditing and validation.

7.   Nature of, and protocols for, AMD IT's support of custodian preservation activities.

8.   Data processing protocols and procedures utilized by AMD's electronic discovery vendor(s), including but not limited to:

(a)   Identity of vendor performing processing functions;

(b)   Processes used;

(c)   Type(s) of data included or excluded from processing;

(d)   Hardware and software used; and

(e)   Documentation, auditing and validation.

9.   De-duplication and near de-duplication methods used by AMD during this Litigation, including but not limited to:

(a)   Protocols, databases and tools used by FCS and Stratify;

(b)   Attenex methodology for de-duplication and near de-duplication; and

(c)   AMD's knowledge of whether Custodians manually de-duplicated or near de-duplicated, the identity of any such Custodians, and any actions taken by AMD related to Custodians' manual deduplication or near-deduplication.

10.   Backup tape policies and protocols, including but not limited to:

(a)   Pre-Litigation disaster recovery backup tapes, including type of backups, software and media used, content and frequency of the backups, tape rotation/recycling schedule, and restoration activities for this Litigation; and

(b)   Preservation of backup tapes for this Litigation, including type of backups, software and media used, content and frequency of the backups, tape rotation/recycling schedule, restoration activities for this Litigation.

11.   Facts underlying the statement in Mr. Herron's letter of October 24, 2005 to Mr. Rosenthal (at 1) that "AMD's document retention and destruction policies were suspended to prevent the inadvertent destruction of documents that may be relevant to this lawsuit."

12.   Any known or suspected non-preservation of AMD Custodian data.

13.   The timing, scope and nature of the problems and/or issues for the following Custodians' data preservation, harvesting, processing and/or productions:

(a)   Redacted

(b)   Redacted

(c)   Redacted

(d)   Redacted

(e)   Redacted

(f)   Redacted   and

(g)   Redacted

14.   AMD's attempts (successful or unsuccessful) to recover, restore or produce documents related to any Custodian (including but not limited to the Custodians identified in Topic 14 above), from backup tapes, other employees' electronic files, and/or from data previously harvested but suppressed by AMD's near-deduplication protocols.

15.   AMD's audits and investigations of the sufficiency of its data preservation, harvesting and productions related to the Litigation.

EXHIBIT B

EXHIBIT B:

**CATEGORIES OF DOCUMENTS AND TANGIBLE THINGS
REQUESTED FOR PRODUCTION**

I.

DEFINITIONS

1.   "AMD" shall mean and refer collectively to plaintiffs Advanced Micro Devices, Inc. and AMD International Sales & Service, Ltd., including their respective past and present officers, directors, agents, attorneys, employees, consultants, or other persons acting on either of their behalf.

2.   "AMD Custodians" or "Custodians" means and refers to the approximately 440 individuals identified by AMD on its Custodian List served on June 1, 2006, pursuant to the Stipulation and Order Regarding Document Production entered by the Court in this Litigation.

3.   "Litigation" means and refers to the litigation in which this Notice of Taking Deposition has been served.

II.

REQUESTS

1.   Documents sufficient to show the dates and sources of each harvest of electronic data for each Custodian, including each harvest from hard drive, Enterprise Vault system, email journaling system, PNS and exchange servers.

2.   For each Custodian, documents sufficient to show the nature and scope of each harvest of electronic data from AMD's Enterprise Vault and email journaling systems, including the search tools, parameters and/or criteria used to extract the data.

3.   By Custodian and for each suppressed email, the logs or tracking information automatically generated by, and/or stored within, the Attenex database(s) as a result of the near-dededeuplication process, as referenced during Mr. Cardine's interview on October 15, 2008.

4.   The logs generated during the migration of PSTs into AMD's Enterprise Vault system, as referenced during   Redacted   interview on December 11, 2008.

5.   Documents sufficient to show which Custodians, if any, requested an increase in his or her mailbox size quotas (after March 1, 2005), the date of any such request(s), and the action taken by AMD's IT department in response to such request(s).

6.   Documents sufficient to show (a) any instructions, recommendation and/or user guides provided to AMD employees, or (b) internal AMD IT policies and/or procedures, related to AMD's Enterprise Vault and email journaling systems.

7.   For each Custodian, documents sufficient to show each email address and/or display name that, when used, would result in an email being delivered to the subject Custodian's AMD email account.

8.   For each individual AMD Custodian for whom data has not been produced to Intel (*i.e.*, non-designated Custodians), documents sufficient to show:

(a)   Timing of and specific steps taken for preservation of data;

(b)   Any known or suspected non-preservation of data;

(c)   Date(s) on which the Custodian's documents were harvested for the Litigation;

(d)   Date(s) on which the Enterprise Vault was first used to capture and preserve email for the Custodian; and

(e)   Date(s) on which the Custodian received a Litigation hold notice.