

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

IN RE)
INTEL CORPORATION)
MICROPROCESSOR ANTITRUST)
LITIGATION)

MDL No. 1717-JJF

ADVANCED MICRO DEVICES, INC., a)
Delaware corporation, and AMD)
INTERNATIONAL SALES & SERVICES, LTD.,)
a Delaware corporation,)

Plaintiffs,)

v.)

INTEL CORPORATION, a Delaware corporation,)
and INTEL KABUSHIKI KAISHA, a Japanese)
corporation,)

Defendants.)

C.A. No. 05-441-JJF

PHIL PAUL, on behalf of himself)
and all others similarly situated,)

Plaintiffs,)

v.)

INTEL CORPORATION,)

Defendants.)

C.A. No. 05-485-JJF

CONSOLIDATED ACTION

REDACTED PUBLIC VERSION
FILED SEPTEMBER 24, 2009

**DECLARATION OF XIN-YI ZHOU IN SUPPORT OF AMD'S
REPLY IN SUPPORT OF ITS MOTION FOR LEAVE TO FILE SUPPLEMENTAL
SUBMISSION IN OPPOSITION TO DEFENDANT'S MOTION TO DISMISS, OR IN
THE ALTERNATIVE, FOR SUMMARY JUDGMENT ON AMD'S EXPORT
COMMERCE CLAIM**

I, Xin-Yi Zhou, declare as follows:

1. I am an attorney admitted to practice law in the State of California and before this Court *pro hac vice*. I am an associate at O'Melveny & Myers LLP, counsel to Advanced Micro Devices, Inc. and AMD International Sales & Service Ltd. (jointly, "AMD") in this action. The matters contained in this Declaration are based on personal knowledge, except those matters stated on information and belief, and if called as a witness, I would competently testify under oath as to them.

2. Submitted as a data CD-ROM, labeled **Exhibits A-M**, are true and correct

REDACTED

Exhibit	File Name
A	REDACTED
B	
C	
D	
E1	
E2	
F	
G	
H	
I	
J	
K	
L	
M	

3. Attached as **Exhibit N** is a true and correct copy of REDACTED

REDACTED

4. Attached as **Exhibit O** is a true and correct copy of REDACTED
REDACTED

5. Attached as **Exhibit P** is a true and correct copy of a May 15, 2009 letter to The Honorable Vincent J. Poppiti from Frederick L. Cottrell, III regarding the parties' joint report pursuant to Amended Case Management Order No. 6.

6. Attached as **Exhibit Q** is a true and correct REDACTED
REDACTED

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 17 day of September, 2009, in Los Angeles, California.

A handwritten signature in black ink, appearing to read 'Xin-Yi Zhou', is written over a horizontal line.

Xin-Yi Zhou

**EXHIBITS A TO Q
REDACTED IN ENTIRETY**

EXHIBIT P

Frederick L. Cottrell, III
Director
302-651-7509
Cottrell@rlf.com

May 15, 2009

**VIA ELECTRONIC MAIL
AND HAND DELIVERY**

The Honorable Vincent J. Poppiti
Blank Rome LLP
Chase Manhattan Centre
1201 Market Street, Suite 800
Wilmington, DE 19801

**Re: Advanced Micro Devices, Inc., et al. v. Intel Corporation, et al.,
C.A. 05-441-JJF; C.A. 05-485-JJF; MDL No. 05-1717-JJF**

Dear Special Master Poppiti:

The parties provide this joint report pursuant to Amended Case Management Order No. 6, dated June 20, 2008, which requires within fifteen days of the end of every second month that the parties “jointly report on the number of hours of depositions each has expended during the preceding two months and any issues relating to the progress of the depositions, or any other issues, that have arisen in connection with the depositions.”

Number of Hours of Depositions Expended by Each Side

During the preceding two months, March and April, the parties expended the following numbers of hours:

For depositions taken in March, Intel 150.5 hours, AMD and Class 217 hours;

For depositions taken in April for which the parties have final transcripts, Intel 128 hours, AMD and Class 152.5 hours. There were eight additional deposition sessions conducted in the last week of April for which the parties are not yet able to provide firm numbers for the hours used because they have only rough transcripts. Based on the rough transcripts, however, the parties estimate that they used the following numbers of hours in those eight sessions: Intel 16, AMD and Class 23.5.

Thus, the estimated totals for the two months are, Intel 294.5 hours, AMD and Class 393 hours. The estimated cumulative total numbers of hours the parties have used since the Court adopted Amended Case Management Order No. 6 through the end of February are:

The Honorable Vincent J. Poppiti
May 15, 2009
Page 2

Intel 645.25 hours, AMD and Class 884.5 hours.

Other Issues in Connection with Depositions

Other than matters that have already been brought to Your Honor's attention, there are no new issues relating to the progress of the depositions or any other issues that have arisen in connection with the depositions that the parties believe presently require Your Honor's attention.

Respectfully,

/s/ Frederick L. Cottrell, III

Frederick L. Cottrell, III (#2555)

cc: Richard L. Horwitz, Esquire (By Hand and Electronic Mail)
James L. Holzman, Esquire (By Hand and Electronic Mail)

EXHIBIT Q

REDACTED IN ENTIRETY

CERTIFICATE OF SERVICE

I hereby certify that on September 24, 2009, I electronically filed the foregoing document with the Clerk of Court using CM/ECF and have sent by Hand Delivery and Electronic Mail to the following:

Richard L. Horwitz, Esquire
Potter Anderson & Corroon LLP
1313 North Market Street
P. O. Box 951
Wilmington, DE 19899

James L. Holzman, Esquire
Prickett, Jones & Elliott, P.A.
1310 King Street
P.O. Box 1328
Wilmington, DE 19899-1328

I hereby certify that on September 24, 2009, I have sent by Electronic Mail the foregoing document to the following non-registered participants:

Darren B. Bernhard, Esquire
Howrey LLP
1299 Pennsylvania Avenue, N.W.
Washington, DC 20004-2402

Robert E. Cooper, Esquire
Daniel S. Floyd, Esquire
Gibson, Dunn & Crutcher LLP
333 South Grand Avenue
Los Angeles, California 90071-3197

Daniel A. Small, Esquire
Cohen Milstein, Sellers & Toll, L.L.C.
1100 New York Avenue, N.W.
Suite 500 - West Tower
Washington, DC 20005

/s/ Frederick L. Cottrell, III
Frederick L. Cottrell (#2555)
cottrell@rlf.com