

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

IN RE INTEL CORPORATION MICROPROCESSOR ANTITRUST LITIGATION)	MDL No. 05-1717-JJF
)	
)	

ADVANCED MICRO DEVICES, INC. and AMD INTERNATIONAL SALES & SERVICE, LTD.,)	C. A. No. 05-441-JJF
)	
)	DM No.
Plaintiffs,)	
)	
vs.)	
)	
INTEL CORPORATION and INTEL KABUSHIKI KAISHA,)	
)	
Defendants.)	

PHIL PAUL, on behalf of himself and all others similarly situated,)	C. A. No. 05-485-JJF
)	
)	
Plaintiffs,)	
)	
vs.)	
)	
INTEL CORPORATION,)	
)	
Defendant.)	

**DECLARATION OF ROBERTA H. VESPREMI IN SUPPORT OF AMD'S
MOTION FOR SANCTIONS FOR INTEL'S FAILURE TO PRESERVE EVIDENCE**

I, Roberta H. Vespremi, hereby declare as follows:

1. I am an associate at the law firm of O'Melveny & Myers LLP, and an attorney licensed to practice before all courts of the State of California. O'Melveny & Myers LLP is the attorney of record for plaintiffs Advanced Micro Devices, Inc. and AMD International Sales & Services, Ltd. I provide this declaration in support of Advanced Micro Devices, Inc.'s Motion for Sanctions for Intel's Failure to Preserve Evidence. I have personal knowledge of the matters recited herein and, if called to do so, could and would competently testify thereto.

2. Attached hereto as **Exhibit 1** is a true and correct copy of a journal article by David Yoffie: "Playing by the Rules: How Intel Avoids Antitrust Litigation," *Harvard Business Review*, June 2001.

3. Attached hereto as **Exhibit 2** is a true and correct copy of records from AMD's SAP system that show the dates on which [REDACTED] started and ended a sabbatical from AMD.

4. Attached hereto as **Exhibit 3** is a true and correct copy of records from AMD's SAP system that show the dates on which [REDACTED] started and ended a sabbatical from AMD.

5. Attached hereto as **Exhibit 4** is a true and correct copy of a record from AMD's SAP system that shows the date [REDACTED] commenced employment with AMD.

[REDACTED] Attached hereto as **Exhibit 5** is a true and correct copy of [REDACTED]
[REDACTED]

[REDACTED] Attached hereto as **Exhibit 6** is a true and correct copy of [REDACTED]
[REDACTED]

[REDACTED] Attached hereto as **Exhibit 7** is a true and correct copy of [REDACTED]
[REDACTED]

9. Attached hereto as **Exhibit 8** is a true and correct copy of [REDACTED]
[REDACTED]

[REDACTED] Attached hereto as **Exhibit 9** is a true and correct copy of a [REDACTED]
[REDACTED]

[REDACTED] Attached hereto as **Exhibit 10** is a true and correct copy of an [REDACTED]
[REDACTED]

[REDACTED] Attached hereto as **Exhibit 11** is a true and correct copy of [REDACTED]
[REDACTED]

13. Attached hereto as **Exhibit 12** is a true and correct copy of

Attached hereto as **Exhibit 13** is a true and correct copy of

Attached hereto as **Exhibit 14** is a true and correct copy of

Attached hereto as **Exhibit 15** is a true and correct copy of

Attached hereto as **Exhibit 16** is a true and correct copy of

18. Attached hereto as **Exhibit 17** is a true and correct copy of introductory remarks made at a May 13, 2009 press conference in Brussels by Neelie Kroes, Commissioner for Competition Policy, European Commission, relating to the Commission's antitrust actions against Intel.

Attached hereto as **Exhibit 18** is a true and correct copy of

Attached hereto as **Exhibit 19** is a true and correct copy of the

Attached hereto as **Exhibit 20** is a true and correct copy of the

Attached hereto as **Exhibit 21** is a true and correct copy of

Attached hereto as **Exhibit 22** is a true and correct copy of [REDACTED]

Attached hereto as **Exhibit 23** are true and correct copies of [REDACTED]

Attached hereto as **Exhibit 24** is a true and correct copy of [REDACTED]

Attached hereto as **Exhibit 25** are true and correct copies of [REDACTED]

Attached hereto as **Exhibit 26** is a true and correct copy of [REDACTED]

Attached hereto as **Exhibit 27** is a true and correct copy [REDACTED]

Attached hereto as **Exhibit 28** are true and correct copies of [REDACTED]

Attached hereto as **Exhibit 29** is a true and correct copy of [REDACTED]

Attached hereto as **Exhibit 30** is [REDACTED]

Attached hereto as **Exhibit 31** is a true and correct copy of [REDACTED]

Attached hereto as **Exhibit 32** is a true and correct copy of [REDACTED]

Attached hereto as **Exhibit 33** is a true and correct copy of [REDACTED]

Attached hereto as **Exhibit 34** is a true and correct copy of [REDACTED]

36. Attached hereto as **Exhibit 35** is a true and correct copy of [REDACTED]

Attached hereto as **Exhibit 36** is a true and correct copy of [REDACTED]

38. Attached hereto as **Exhibit 37** is a true and correct copy of [REDACTED]

Attached hereto as **Exhibit 38** is a true and correct copy of [REDACTED]

Attached hereto as **Exhibit 39** are true and correct copies of [REDACTED]

Attached hereto as **Exhibit 40** is a true and correct copy of [REDACTED]

Attached hereto as **Exhibit 41** is a true and correct copy of [REDACTED]

Attached hereto as **Exhibit 42** is a true and correct copy of a [REDACTED]

Attached hereto as **Exhibit 43** is a true and correct copy of [REDACTED]

Attached hereto as **Exhibit 44** is a true and correct copy of [REDACTED]

Attached hereto as **Exhibit 45** is a true and correct copy of [REDACTED]

Attached hereto as **Exhibit 46** are true and correct copies of [REDACTED]

Attached hereto as **Exhibit 47** are true and correct copies of [REDACTED]

Attached hereto as **Exhibit 48** are true and correct copies of [REDACTED]

Attached hereto as **Exhibit 49** are true and correct copies of [REDACTED]

Attached hereto as **Exhibit 50** are true and correct copies [REDACTED]

Attached hereto as **Exhibit 51** are true and correct copies of [REDACTED]

Attached hereto as **Exhibit 52** is a true and correct copy of [REDACTED]

Attached hereto as **Exhibit 53** are true and correct copies of [REDACTED]

Attached hereto as **Exhibit 54** are true and correct copies [REDACTED]

Attached hereto as **Exhibit 55** is a true and correct copy of [REDACTED]

Attached hereto as **Exhibit 56** is a true and correct copy of [REDACTED]

Attached hereto as **Exhibit 57** is a true and correct copy of

Attached hereto as **Exhibit 58** is a true and correct copy of

Attached hereto as **Exhibit 59** is a true and correct copy of

61. Attached hereto as **Exhibit 60** is a true and correct copy of

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Attached hereto as **Exhibit 66** is a true and correct copy of

68. Attached hereto as **Exhibit 67** is a true and correct copy of

Attached hereto as **Exhibit 68** is a true and correct copy of

70. Attached hereto as Exhibit 69 is a true and correct copy of [REDACTED]

[REDACTED]

71. Attached hereto as Exhibit 70 is a true and correct copy [REDACTED]

[REDACTED]

72. Attached hereto as Exhibit 71 is a true and correct copy [REDACTED]

[REDACTED]

[REDACTED]

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 14th day of October, 2009, in Menlo Park, California.

Roberta H. Vespremi
Roberta H. Vespremi

CERTIFICATE OF SERVICE

I hereby certify that on October 19, 2009, I electronically filed the foregoing document with the Clerk of Court using CM/ECF and have sent by electronic mail to the following:

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

James L. Holzman, Esquire
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1310 King Street
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Wilmington, DE 19899-1328

I hereby certify that on October 19, 2009, I have sent by electronic mail the foregoing document to the following non-registered participants:

Darren B. Bernhard, Esquire
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/s/ Frederick L. Cottrell, III
Frederick L. Cottrell, III (#2555)
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