

EXHIBIT B

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August 27, 2008

VIA E-MAIL

Margaret M. Zwisler
Latham & Watkins LLP
555 Eleventh Street, N.W., Suite 1000
Washington, D.C. 20004

**Re: *In re Intel Corporation Microprocessor Antitrust
Litigation, Case No. MDL 05-1717 (D. Del.)***

Dear Mrs. Zwisler:

This responds to your August 18, 2008 letter to Sogol Pirnazar and your August 19, 2008 email to me regarding Intel's Rule 30(b)(6) deposition notice to AMD.

As I previously indicated, we have noticed the deposition of AMD, not ATI. We are not required to subpoena AMD, a party to this litigation.

We do not seek to take the deposition of Dr. Michelle Burtis. We want to depose the person(s) most knowledgeable at AMD about the factual basis for AMD's position in the *In re Graphics Processing Units Antitrust Litigation*, MDL 1826, regarding the factors one must take into account to trace an increase in the price of a GPU to the price that an ultimate consumer pays for a computer containing the GPU. While Dr. Burtis' opinions were based in part on statistical analysis, she also relied on many facts about the computer industry that are relevant here, including facts about the relationships and negotiations between the parties within the channels of distribution of computer components and computers as well as the pricing decisions and strategies of the parties involved in the manufacture and sale of computer components and computers. *See, e.g.*, Expert Report of Michelle M. Burtis Regarding Indirect Purchaser Pls.' Mot. for Class Certification, ¶¶ 21, 35-36, 62, 68-83. Such information about the way the market for GPUs works is reasonably likely to lead to relevant information about the way the market for CPUs works.

The plain language of Dr. Burtis' report indicates that she considered and/or relied upon information that she obtained from AMD (perhaps from one or more of the seven AMD

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employees Dr. Burtis interviewed in connection with the preparation her report).¹ Intel is entitled to obtain this information, and a 30(b)(6) deposition of AMD is an appropriate vehicle to do so.

If AMD refuses to make a 30(b)(6) witness available and intends to move for a protective order, please let us know immediately. If not, please provide us with the dates on which AMD is available for the deposition during the weeks of September 8th and 15th.

Sincerely,



Kristen A. Palumbo

cc: Michael M. Maddigan
Darren B. Bernhard
Daniel S. Flloyd
Bernhard Barmann
Sogol Pirnazar

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¹ See Expert Report of Michelle M. Burtis Regarding Indirect Purchaser Plaintiffs' Motion for Class Certification, Ex. I-2 at 4 (identifying interviews Dr. Burtis considered in preparation of her Expert Report).