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November 21, 2007

## **HAND DELIVERED**

Niall E. Lynch, Esq. Antitrust Division U.S. Department of Justice 450 Golden Gate Avenue P. O. Box 36046, Room 10-0101 San Francisco, CA 94102

RE:

In re: United States v. Gary Swanson, No. Dist. CA;

CR 06-0692 PJH

Dear Niall:

In accordance with the court's order, I enclose the list specifying the documents that Jerry Hausman has been able to identify as those upon on which his opinions are based. I have also enclosed copies of those documents which he still had readily available. As you know from the Summary, Professor Hausman also relied upon his consulting experience in the semiconductor industry for the past 20 years. If you have further questions about any of these documents or wish to discuss it further, do not hesitate to give me a call.

Very truly yours,

Bartko-Zankel-Tarrant-Miller
A Professional Corporation

William I. Edlund

WIE/VMR

cc:

John J. Bartko, Esq. Robert H. Bunzel, Esq. John F. McLean, Esq.

## LIST OF DOCUMENTS

- 1. IC Insights, Inc, 2003 (The McLean Report).
- 2. Consulting Reports from International Data Corporation (IDC, Framingham, MA 01701).
- 3. J. Hausman, "The Effect of Sunk Costs in Telecommunication Regulation," in J. Alleman and E. Noam, eds, <u>The New Investment Theory of Real Options and its Implications for Telecommunications Economics</u>, 2002.
- 4. DRAMs from Taiwan, USITC Pub. 3146 (Dec. 1998)
- 5. Department of Commerce Calculation Memorandum, March 31, 2003
- 6. Dynamic Random Access Memory Semiconductors of One Megabit and Above from Taiwan, Inv. No. 731-TA-811 (Final), Pub. No. 3256 (Dec. 1999)
- 7. Hynix June 15, 2001 Offering Memorandum for Global Depository Shares
- DRAMs and DRAM Modules From Korea, Investigation No. 701-TA-431
   (Preliminary). USITC Publication 3569, December 2002
- 9. SEC filings of Micron
- 10. "Hynix Creditors Advised to Swap W1.9 Trillion of Loans Into Equity," Korea Herald, November 27, 2002.
- 11. "Hynix to Offer 912.3 Trillion in Bonds," Korea Herald, November 23, 2002.
- 12. Hynix Semiconductor, Company Update, J.P. Morgan, September 13, 2002
- 13. "Hynix Samples DRAMs Using 0.13 Micron Rules," Electronic Engineering Times, September 17, 2001
- 14. J. Hausman, "Valuation and the Effect of Regulation on New Services in Telecommunications," <u>Brookings Papers on Economic Activity: Microeconomics</u>, 1997.
- 15. Data Considered (Variable Descriptions as noted on Appendix: Econometric Analysis of DRAM Prices)
- 16. Hynix Woes Add Pressure to Spot Market," Dow Jones International, 3 September 2001.