

EXHIBIT A

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

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

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

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

**NOTICE OF TAKING DEPOSITION OF
ADVANCED MICRO DEVICES, INC. and AMD INTERNATIONAL
SALES & SERVICE, LTD.**

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, defendant Intel Corporation will take the deposition of Advanced Micro Devices, Inc. and AMD International Sales & Service, Ltd. (collectively, "AMD") on January 29-30, and February 2-4, 2009, beginning each day at 9:30 a.m., at the offices of Bingham McCutchen LLP, Three Embarcadero Center, San Francisco, CA 94111, or at such other time and place as the parties may agree. The deposition will be recorded by stenographic and sound-and-visual

(videographic) means, will be taken before a Notary Public or other officer authorized to administer oaths, and will continue from day to day until completed, weekends and public holidays excepted.

Reference is made to the "Description of Matters on Which Examination is Requested" attached hereto as Exhibit A and incorporated herein by this reference. In accordance with Rule 30(b)(6) of the Federal Rules of Civil Procedure, AMD is hereby notified of its obligation to designate one or more officers, directors, or managing agents (or other persons who consent to do so) to testify on its behalf as to all matters embraced in the "Description of Matters on Which Examination is Requested" and known or reasonably available to AMD.

PLEASE TAKE FURTHER NOTICE that, pursuant to Rules 30(b) and 34 of the Federal Rules of Civil Procedure, Intel requests that AMD produce for inspection, copying and use at the deposition all of the documents and other tangible things in their possession, custody, or control and responsive to the "Categories of Documents and Tangible Things Requested for Production" attached as Exhibit B and incorporated herein by reference. Production shall take place at the time and place of the deposition or at such other time and place as the parties agree.

OF COUNSEL:

Robert E. Cooper
Daniel S. Floyd
Gibson, Dunn & Crutcher LLP
333 South Grand Avenue
Los Angeles, CA 900071
(213) 229-7000

Peter E. Moll
Darren B. Bernhard
Howrey LLP
1299 Pennsylvania Avenue
N.W. Washington, DC 20004
(202) 783-0800

Dated: December 30, 2008

POTTER ANDERSON & CORROON LLP

By: /s/ W. Harding Drane, Jr.
Richard L. Horwitz (#2246)
W. Harding Drane, Jr. (#1023)
Hercules Plaza, 6th Floor
1313 N. Market Street
P.O. Box 951
Wilmington, DE 19899-0951
(302) 984-6000
rhowitz@potteranderson.com
wdrane@potteranderson.com

Attorneys for Defendants
Intel Corporation and Intel Kabushiki Kaisha

EXHIBIT A

EXHIBIT A:

**DESCRIPTION OF MATTERS ON WHICH
EXAMINATION IS REQUESTED**

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.

SUBJECT MATTER

1. AMD's implementation and use of Enterprise Vault (in all relevant geographic regions) including but not limited to:
 - (a) Timing of implementation and deployment;
 - (b) Initial configuration and any subsequent changes thereto;
 - (c) Migration of data into Enterprise Vault storage, including the type(s) of data migrated and not migrated;
 - (d) Quality control safeguards and auditing;
 - (e) Reporting, search and production capabilities;
 - (f) Processes used to extract data from the system; and
 - (g) Errors, malfunctions, data corruption or loss.

2. AMD's implementation and use of an email journaling system (in all relevant geographic regions) including but not limited to:

- (a) Timing of implementation and deployment;
- (b) Initial configuration and any subsequent changes thereto;
- (c) Type(s) of data the email journaling system was configured to preserve and types of data it was not configured to preserve;
- (d) Quality control safeguards and auditing;
- (e) Reporting, search and production capabilities;
- (f) Processes used to extract data from the system; and
- (g) Errors, malfunctions, data corruption or loss.

3. Configuration of AMD's email systems, including but not limited to:

- (a) Employees' ability to customize email settings that could impact preservation of emails;
- (b) Dumpster settings, use of shift-delete, and AMD Custodians' ability to permanently delete email messages.
- (c) Mailbox size limits or quotas for AMD employees' email including but not limited to:
 - 1) Nature and purpose of any limits or quotas, including any changes after AMD reasonably anticipated this *Litigation*;
 - 2) Consequence(s) of an email account nearing or reaching the limit or quota;
 - 3) Recommendations or instructions to employees and Custodians; and
 - 4) Whether and when AMD Custodians reached storage limits after March 11, 2005, and the identities of such Custodians.

4. Date on which AMD first reasonably anticipated this *Litigation*, and the events and circumstances leading to AMD's decision to commence this *Litigation*.

5. AMD's litigation hold notices for the *Litigation*, including but not limited to:

- (a) The timing of AMD's issuance of written *litigation hold notices*;
- (b) Meaning and intent of the language used;