

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

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

IN RE
INTEL CORPORATION
MICROPROCESSOR ANTITRUST
LITIGATION

MDL No. 1717-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

ORDER

On this _____ day of _____, 2008, having considered the submissions and the arguments of the parties, and any responses thereto, IT IS HEREBY ORDERED that the Confidentiality Agreement and Protective Order (the “Protective Order”) entered on September 26, 2006 is amended as follows:

1. David L. Finger, George H. Freeman, Eric N. Lieberman, Jason Conti and Burke Hansen (“Movants’ Counsel”) are added as parties to the Protective Order.

2. Movants’ Counsel shall be entitled to receive and review unredacted versions of all motions, briefs and other documents filed with the Court, with the exception of documents produced in discovery.

3. Movants’ Counsel shall receive the documents described in numbered paragraph 2 above pursuant to an “attorneys’ eyes only” designation, and may not disclose, discuss or otherwise reveal the contents of said documents to anyone who is not a party to the Protective Order.

4. The following protocol for unsealing documents is hereby approved:

a. Intel Corporation and Advanced Micro Devices, Inc. will review documents associated with docket numbers 625, 627, 628, 629, 634, 635, 645, 646 and 648 and “unredact” those sealed portions of the documents: (a) which contain stale information derived from documents created or generated prior to the filing of the original complaints in the above-captioned actions; or (b) otherwise do not satisfy the definition of “Confidential Information” set forth in the Confidentiality Order.

b. With respect to documents filed going forward in this case, Intel Corporation and Advanced Micro Devices, Inc., subject to the terms of the Order entered by the Court pursuant to this Motion and the Protective Order, will provide to Movants’ counsel for attorney eyes only review unsealed copies of documents filed partially or entirely under seal, identifying those portions which

are proposed to be “unredacted” and those portions as to which Intel Corporation and/or Advanced Micro Devices, Inc. is designating as remaining sealed.

c. To the extent that Movants disagree with any designation continuing to keep information under seal, Movants may then apply to the Special Discovery Master for relief.

d. Movants shall continue to have the right to seek unsealing of any documents filed with the Court previous or subsequent to the entry of this Order. In such circumstance, Movants, or any of them, seeking to unseal a document or documents shall first make a demand on Advanced Micro Devices, Inc. and Intel Corporation, who shall provide a copy of the document(s) in question to counsel for the requesting party or parties for attorney’s eyes only, pursuant to this Order and the terms of the Confidentiality Order. Movants and the parties shall attempt to come to a good faith resolution of any issue of public access prior to the filing of any motion with the Special Discovery Master.

e. This protocol is limited in application to discovery-related filings under the jurisdiction of the Special Discovery Master. Movants retain all rights to seek unsealing of any other documents outside the scope of discovery-related proceedings, and nothing in this proposed protocol is intended to limit such rights in any way.