## EXHIBIT B

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

ADVANCED MICRO DEVICES, INC. and AMD INTERNATIONAL SALES & SERVICE, LTD.,	)	
Plaintiffs, v.	)	C. A. No. 05-441 (JJF)
INTEL CORPORATION and INTEL KABUSHIKI KAISHA,  Defendants.	) ) )	
IN RE INTEL CORPORATION MICROPROCESSOR ANTITRUST LITIGATION	)	C.A. No. 05-MD-1717 (JJF)

# INTEL CORPORATION'S AND INTEL KABUSHIKI KAISHA'S THIRD SET OF INTERROGATORIES TO PLAINTIFFS ADVANCED MICRO DEVICES, INC. AND AMD INTERNATIONAL SALES & SERVICE, LTD.

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, defendants Intel Corporation and Intel Kabushiki Kaisha (collectively "Intel") request plaintiffs Advanced Micro Devices, Inc., and AMD International Sales & Service, Ltd. (collectively "AMD") to answer each of the following interrogatories separately in writing under oath.

#### **DEFINITIONS**

1. Intel incorporates the definitions and instructions contained in "Intel Corporation's and Intel Kabushiki Kaisha's First Set of Requests for the Production of Documents to Plaintiffs Advanced Micro Devices, Inc. and AMD International Sales & Service, Ltd."

2. "Intel's Alleged Wrongful Acts" means and refers to the alleged acts taken by Intel as described in paragraphs 35 through 126 in AMD's Complaint.

#### TIME PERIOD

All information requested is for the time period covered by the Complaint until the date of the answers to these interrogatories.

#### **INTERROGATORIES**

- 9. If AMD alleges that it would have sold additional x86 microprocessors in the absence of Intel's Alleged Wrongful Acts, identify:
  - a. the number of additional x86 microprocessors AMD would have sold;
  - b. the model numbers of the additional x86 microprocessors AMD would have sold;
  - c. the purchasers who would have bought the additional x86 microprocessors AMD would have sold, and which ones in what quantities;
  - d. the prices at which AMD would have sold the additional microprocessors;
  - e. the costs AMD would have incurred to manufacture the additional x86 microprocessors;
  - f. the capital investment that AMD would have been required to make in order to manufacture the additional x86 microprocessors; and
  - g. the gross and net profits AMD would have earned by the sale of the additional x86 microprocessors.
- 10. If AMD alleges that, in the absence of Intel's Alleged Wrongful Acts, additional entities other than AMD would have started producing or would have increased their production of x86 microprocessors, identify:

- a. each entity that would have started producing or increased their production of x86 microprocessors; and
- b. the number, cost, and type of any additional x86 microprocessors that would have been produced.
- 11. State all facts on which AMD relies upon for the statement, in Paragraph 131 of the Complaint, that the "x86 Microprocessor Market is a relevant product market within the meaning of the antitrust laws."
- 12. With respect to your alleged x86 microprocessor relevant market, identify, in terms of market percentage, the changes in the relative positions of AMD and Intel in the desktop (both commercial and consumer), mobile (both consumer and commercial), and server market segments that would have occurred in the absence of Intel's Alleged Wrongful Acts, and when they would have occurred.
- 13. Identify the dates and means by which (a) AMD would have begun to increase its capacity to produce x86 microprocessors in the absence of Intel's Alleged Wrongful Acts and (b) such increase would have enabled AMD to produce the number of the additional microprocessors it believes it could have sold in a market unrestrained by Intel's Alleged Wrongful Acts.

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