EXHIBIT A
measures the effectiveness of the program?

   MS. CONNELL: Same objections.

   THE WITNESS: I don't know.

   Affirmative action plans has nothing to do with my role.

   MR. FINBERG: Q. Okay. Do you know if Oracle conducts audits to ensure compliance with its requirements under 41 CFR 60-2.17?

   MS. CONNELL: Objection. Calls for a legal conclusion and beyond the scope of the PMK topic.

   And it also -- I also -- it also contains a misstatement of the law.

   You can answer, if you know.

   THE WITNESS: I -- I don't -- I don't know enough about the legal requirements of whatever that abbreviation was that you gave.

   MR. FINBERG: Q. Okay.

   A. That is not my area of expertise at all.

   Q. Do you know whether Oracle does internal pay audits?

   MS. CONNELL: I'll caution the witness not to disclose anything that's covered by the attorney-client privilege or attorney work-product doctrine.
THE WITNESS: I am aware that we -- with internal counsel and with outside counsel, under their direction, that there have been audits taken -- that have taken place.

The -- the -- everything about that is covered under the attorney-client privilege and is done in order to give Oracle legal advice, and I'm not privy to speak on such things.

MR. FINBERG: Q. Who requested that the audits be done?

MS. CONNELL: Objection. She --

MR. FINBERG: Q. If you know.

These are just foundational questions.

A. I don't know.

Q. To whom were the -- with whom were the audits shared?

MS. CONNELL: Objection. That infringes on the attorney-client privilege.

She's asserted the privilege.

MR. FINBERG: It has to do -- it's a foundational question.

THE WITNESS: I don't have any idea.

MR. FINBERG: Q. Okay. Do you have an understanding as to whether the OFCCP believes that 41 CFR 60-2.17 requires internal pay equity