

# **EXHIBIT B**

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UNITED STATES DEPARTMENT OF LABOR  
OFFICE OF ADMINISTRATIVE LAW JUDGES

OFFICE OF FEDERAL CONTRACT ) OALJ Case No.  
COMPLIANCE PROGRAMS, UNITED ) 2017-OFC-00006  
STATES DEPARTMENT OF LABOR, )  
 ) OFCCP No.  
Plaintiff, ) R00192699  
 )  
vs. )  
 )  
ORACLE AMERICA, INC., )  
 )  
Defendant. )  
\_\_\_\_\_ )

VIDEOTAPED DEPOSITION OF SHAUNA HOLMAN-HARRIES  
9:00 a.m.  
May 8, 2019  
Phoenix, Arizona

REPORTED BY:  
Robin L. B. Osterode, CSR, RPR  
AZ Certified Reporter No. 50695  
JOB No. 190508ROS

17:39:24 1 about October 29th, 2015?

17:39:26 2 A. If you can give me a minute just to -- to

17:39:30 3 finish looking at it.

17:40:15 4 Q. That was the last exhibit. Are you done

17:40:17 5 looking --

17:40:17 6 A. Yeah.

17:40:17 7 Q. -- at Exhibit 38?

17:40:18 8 A. Yeah, there was just question in my mind,

17:40:21 9 I'm sorry.

17:40:33 10 Yes.

17:40:36 11 Q. Okay. And the numbered -- the portions of

17:40:42 12 Exhibit 38 that are in bolder print --

17:40:45 13 A. Uh-huh.

17:40:46 14 Q. -- are those OFCCP's questions to you for

17:40:51 15 requests for information to OFCCP?

17:40:53 16 A. Yes.

17:40:54 17 Q. And then your responses are in the lighter

17:40:59 18 print; is that right?

17:40:59 19 A. Yes.

17:41:00 20 Q. And the first -- the first request is a

17:41:16 21 request for internal pay equity analyses conducted

17:41:20 22 during the past three years, as required by the

17:41:22 23 regulations. Correct?

17:41:25 24 A. Uh-huh.

17:41:25 25 Q. And in response to OFCCP's request for

17:41:31 1 Oracle's pay equity analyses conducted under the  
17:41:35 2 regulations, you did not provide any pay equity  
17:41:41 3 analysis to OFCCP. Correct?

17:41:42 4 A. Correct.

17:41:43 5 Q. Under request number 2, one of the requests  
17:41:46 6 was "Names of schools attended." What did you do to  
17:41:49 7 determine if Oracle had educational information in  
17:41:53 8 its databases?

17:41:56 9 A. We would have had to look up education and  
17:42:02 10 go into each individual's personnel file in order to  
17:42:05 11 do it. Earlier when I started working at Oracle we  
17:42:10 12 tried to pull in educational information into some of  
17:42:13 13 our data sheets, and by looking in the employee  
17:42:17 14 personnel file, not only was the education listed in  
17:42:21 15 there, so in order to -- to get the education, we  
17:42:24 16 would have had to have gone, tried to backtrack  
17:42:27 17 everybody, to see if they applied to a numbered  
17:42:31 18 requisition, and then go back into all of the people  
17:42:36 19 that applied to the requisition for whatever year  
17:42:38 20 they were hired in, and then try and find education  
17:42:42 21 there.

17:42:43 22 But when we did the -- started looking at  
17:42:44 23 some of these reports that OAL did, at one point we  
17:42:49 24 tried to pull that in, and they said we wouldn't be  
17:42:52 25 able to do so, so it wouldn't provide consistent

1 STATE OF ARIZONA )  
2 COUNTY OF MARICOPA )

3 CERTIFICATE

4 I, ROBIN L. B. OSTERODE, Certified Reporter  
5 for the State of Arizona and Certified Shorthand  
6 Reporter for the State of California certify:

7 That the foregoing proceeding was taken by  
8 me; that I am authorized to administer an oath; that  
9 any witness, before testifying, was duly sworn to  
10 testify to the whole truth; that the questions and  
11 answers were taken down by me in shorthand and  
12 thereafter reduced to print by computer-aided  
13 transcription under my direction; that the foregoing  
14 pages are a full, true, and accurate transcript of  
15 all proceedings, to the best of my skill and ability.

16 I FURTHER CERTIFY that I am in no way  
17 related to nor employed by any of the parties hereto,  
18 nor am I in any way interested in the outcome hereof.

19 DATED this 12<sup>th</sup> day of May, 2019.  
20  
21

22  
23   
24 ROBIN L. B. OSTERODE, CSR, RPR  
25 CA CSR No. 7750  
AZ CR No. 50695